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ABSTRACT

The criteria and procedures by which accrediting and state approval agencies are evaluated were assessed to determine how well they identify the agencies that can be relied on to make sound judgments of educational quality. The detailed examination of the content of the staff reports, the judgments of the relative importance of specific agency attributes, simulated decisions, and a conference led to the following conclusions: the existing criteria address the important issues in identifying agencies that perform effectively in evaluating the quality of educational programs and institutions: the criteria have been applied consistently, and the decisions reached have been appropriate. The study also showed, though, that while substantive changes in the criteria are not necessary, the recognition process would probably be improved through a restructuring and clarifying of the existing criteria, and through development of more effective procedures for evaluating the criteria addressed to quality of performance rather than to the existence of appropriate procedures. Appendices include criteria for recognition, a questionnaire on the importance of accrediting agency characteristics, mean ranks of comparative importance, a questionnaire on changes in accrediting and approval, suggestions for modifying the recognition process, and an instrument for external validation of Office of Education judgments. (SW)

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EVALUATION OF OE CRITERIA FOR THE RECOGNITION OF ACCREDITING AND STATE APPROVAL AGENCIES

PART I

RELIABILITY, VALIDITY, IMPACT, AND SUGGESTIONS

Jonathan R. Warren

May 1980

U.S. DEPARTMENT OF HEALTH,
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SUMMARY

BACKGROUND

To assure that federal funds for postsecondary education, whether allotted to students or directly to an institution, are used in sound educational programs, they are limited almost entirely to accredited institutions. For some nursing and vocational schools, approval by a recognized state agency serves in place of accreditation to indicate educational effectiveness. Because accrediting agencies are private voluntary associations of schools or colleges which any group of institutions may establish, the U.S. Commissioner of Education has published a set of criteria that agencies must meet to demonstrate their capacity for assessing and making judgments about educational quality.

The evaluation of an agency's performance with respect to the published criteria is based on the agency's own self-description, a visit to the agency by staff of the Division of Eligibility and Agency Evaluation (DEAE), possibly observation of one of the agency's site visits, a written report to the Commissioner's Advisory Committee on Accreditation and Institutional Eligibility by DEAE staff, and a public hearing by the Committee. The evaluative process leads to the granting or denial of recognition to an agency--that is, to acceptance or rejection of its decisions to accredit as indicative of good educational practice. The purpose of the present study was to evaluate the criteria and procedures on which recognition is based, examining how well they identify the agencies that can be relied on to make sound judgments of educational quality.

PROCEDURES

The DEAE staff reports include most of the information on which the recognition of accrediting agencies is based. All the reports produced by DEAE, covering 234 recognition decisions from 1968 to 1978, were analyzed for structure, consistency, and the qualities that distinguished recognized agencies from those denied recognition. Late in 1977, Educational Testing Service staff identified, in a sample of staff reports, more than 500 statements describing agency characteristics relevant to the criteria for recognition. The most representative of these were judged for their importance in determining educational quality by the directors of about 80 percent of existing accrediting and state approval agencies, both recognized and unrecognized. Additionally, more than 200 institutional or program administrators and faculty members, state and federal officials concerned with accrediting, and scholars and critics of accrediting also judged the importance of a similar set of statements drawn from the staff reports. These groups, with the agency directors, represented virtually all knowledgeable views of accrediting. The directors also completed questionnaires on (1) the effects of the recognition process on their activities, and (2) suggested changes in recogition criteria and procedures.

The reliability of the recognition process was examined in relation to (1) how reliably the observations can be made that lead to the descriptive statements in the DEAE staff reports, (2) how consistent the descriptive information was from one point to another in the recognition process, and (3) how consistently the critical distinctions among agencies were maintained, from year to year and as different agencies were evaluated. The validity of the process was assessed by examining (1) how well the critical elements in the decisions matched the attributes of accrediting agencies considered by a large group of experts to be most important in evaluating educational quality; (2) how inclusive the criteria are with respect to attributes pertinent to the evaluation of educational quality, and how completely the criteria have been applied in the recognition process; and (3) how well a sample of actual recognition decisions agreed with the independent evaluations of a diverse group of experts.

For the comparison of independent evaluations with recognition decisions that had been made over the past ten years, ETS researchers wrote composite descriptions that characterized agencies about which each of five types of decisions had been made--denial of recognition or recognition for periods of from one to four years. These composite agencies were then judged and granted or denied recognition by more than 100 persons drawn from the groups of agency directors and others who had previously been involved in the study. Finally, 44 of the persons who had made those simulated recognition decisions met for a day and a half to discuss their decisions, the criteria for recognition, and the issues to be addressed in a procedure intended to identify effective judges of educational programs and institutions.

RESULTS

Judged Importance of the Criteria

The qualities of accrediting agencies judged most important by agency directors and by the other groups whose views were solicited were those related to the development and maintenance of standards, procedures for evaluating programs or institutions, and the fairness and integrity of the accrediting process. Agreement on the relative importance of agency attributes was high across all the groups providing judgments and among directors of all types of agencies. Those common perceptions of the requirements for an effective agency suggest that separate sets of criteria for state vocational and state nursing agencies, which at present differ from those for private regional and specialized agencies, are unnecessary. Differences in organizational structure and operating procedures can be accommodated readily within a single set of criteria.

The specific attributes that contributed to judgments about an agency's performance with respect to particular criteria varied widely in judged importance. That an agency publishes its standards, defines them clearly, applies them fairly, and reviews them periodically were highly important considerations in the views of all the groups providing judgments. That an agency evaluates the validity and reliability of its standards and checks them against the performance of program graduates were seen as characteristics appreciably less important, even though they bear on the same general concern for standards. The importance attached to broad aspects of the criteria differed at times from the importance attached to the detailed characteristics related to the broader issues. The discrepancies between issues as viewed generally and as seen in their component parts suggested a need either for clarification and elaboration of the meaning of the general issues--such as the nature of an agency's attention to standards--or for more searching ways to evaluate them.

Judged Observability of the Criteria

The agency directors who provided judgments of the importance of various agency characteristics also specified those that were difficult to observe and evaluate. About two-thirds of the qualities related to the criteria on which recognition decisions rest were judged to be reasonably open to observation. These involved organizational, structural, or procedural issues, such as the forms of evaluative procedures, or whether procedures and standards are published. The other third--those assessed as being difficult to observe--were related to the effectiveness, merit, or quality of an agency's activities. Most of the criteria had some associated attributes that were readily observed. The exceptions dealt with the fairness and impartiality of the decisions, administrative effectiveness, and financial strength. Few if any aspects of these qualities were seen as accessible to observation. The reliability of the observations on which recognition is based is therefore mixed, although the criteria on the whole refer to attributes generally considered observable.

Distinctions Between Agencies Recognized and Denied Recognition

The general issues that discriminated among recognized agencies and those denied or given limited recognition were consistent from year to year and from one step in the recognition process to another--that is, from the agencies' petitions for recognition to the DEAE staff report to the Advisory Committee. Error in the process was evident primarily in the detailed agency attributes related to a criterion rather than in the general qualities of an agency. Thus while weakness in an agency's evaluative procedures could be expected to be reliably observed and reported, the specific aspects on which that judgment rested might be reported differently by different observers. More detailed specification of the ways agencies might demonstrate that they meet the requirements of various criteria, and again, clearer definition and differentiation of some of the criteria, would probably improve the consistency with which relevant details of an agency's operations were evaluated. With respect to the broad distinctions among agencies that are reflected by differences in their recognition status, the process is quite reliable.

The agency characteristics most strongly associated with the recognition decisons were, with one exception, those also judged to be most important. Recognition therefore indicated the presence of qualities of agency organization and performance that were uniformly considered by highly divergent groups to be those most important in making judgments about the quality of educational programs. The strength of their evaluative procedures and the fairness and impartiality of their decisions differentiated strongly among agencies awarded and denied recognition and were also among the qualities judged highest in importance. The exception to this association between judged importance and influence in the decisions dealt with the representation of the general public and other constituencies on an agency's governing board; while comparatively low in judged importance, this issue was influential in the actual decisions.

In addition to showing a good match between importance and influence in the recognition decisions, the recognition process gave attention to virtually all agency attributes that are pertinent to recognition. None of the suggested additions to the criteria received much support from agency directors as a group, nor did important issues appear during the conference of experts that would indicate gaps in the recognition criteria. All but a handful of the criteria played a role in the decisions, although the importance of that role varied. The few criteria that did not affect the decisions directly were those that agencies complied with readily, such as having operated for at least two years. The recognition process is therefore valid in the sense that it takes into account all the pertinent issues and does so, in general, with appropriate regard to their relative importance.

Simulated Decisions

The varied group of judges who made simulated recognition decisions after reviewing composite descriptions of agencies awarded recognition for different periods agreed quite well with the actual decisions. Disagreements centered largely on agencies recognized for less than four years. When they differed, the judges' decisions were more lenient than the actual decisions that had been recommended by the Advisory Committee. The most influential qualities, in the view of the judges, were the fairness of the agencies' decisions, the effectiveness of the evaluative procedures, the closeness of the attention given to standards, and the quality of the agencies' staffs. They judged as comparatively unimportant the representation of the general public on the governing board and the monitoring of ethical practice. The considerations that influenced the simulated decisions thus closely paralleled those found to discriminate among agencies in the actual decisions and those judged earlier to be most important.

The conference participants who examined the simulated decisions and the existing criteria concentrated their attention on three major issues. Their primary concern was with an agency's integrity--impartiality, fairness, and independence of judgment. The second important issue was whether the evaluation of what students had learned, or educational outcomes, should be part of the accrediting process. While strong support was given to the view that good educational practice requires evaluation of the graduates of programs and institutions, some participants were reluctant to see accrediting agencies take that on as a concern. In their view, the purposes and products of educational institutions should not be subject to external review; sound procedures should be the only concern of accrediting. The third major issue involved the appropriate level of generality or specificity of the recognition criteria and for accrediting agencies' standards. The participants felt that criteria and standards should be specific enough to provide useful guides to performance but not so specific that flexibility and applicability are lost. Thus, while a general requirement that institutions gather information on their graduates was considered desirable, requiring that information to take a particular form or to show particular results would be undesirable. As with the earlier judgments, agreement on the general issue was broad; it narrowed as the issue became more specific.

Effects of the Recognition Process and Suggestions for Change

Recent changes reported by the agency directors have been in procedures and standards, not in organizational structure, integrity, or concern for due process. According to the directors, procedures have become more systematic; self-study and site visit procedures have been improved; and standards have become stronger and better defined. The improvement in self-study procedures, better procedures for dealing with complaints, and greater public representation on the governing board have all been attributed to the recognition process and its requirements. On the negative side, the directors reported that those requirements have resulted in an increased burden on the accrediting agencies.

Suggestions that the directors generally agreed would strengthen the recognition process were focused primarily on ways to improve communication between DEAE and the agencies, particularly in providing more specific guidelines for meeting the recognition criteria. A second suggestion that received a high level of agreement was that institutions be held legally accountable for the proper use of federal funds. None of the changes in criteria that individual directors had suggested attracted wide support.

CONCLUSIONS

The detailed examination of the content of the staff reports, the judgments of the relative importance of specific agency attributes, the simulated decisions, and the conference led to the following conclusions: the existing criteria address the important issues in identifying agencies that perform effectively in evaluating the quality of educational programs and institutions; the criteria have been applied consistently; the decisions reached have been appropriate. The study also showed, though, that while substantive changes in the criteria were not necessary, the recognition process would probably be improved through a restructuring and clarifying of the existing criteria, and through development of more effective procedures for evaluating the criteria addressed to quality of performance rather than to the existence of appropriate procedures.

I. INTRODUCTION

Billions of dollars each year flow from the federal government to postsecondary education, much of it in the form of financial aid to students. To exercise some control over the value of the education bought with those dollars, the government requires that at least one of several conditions be met by educational institutions if they or their students are to be eligible to receive federal money. By far the most common way for an institution to establish its eligibility for federal funds--whether it is public or private, nonprofit or proprietary, degree-granting or occupational--is to be accredited by a private voluntary accrediting agency or approved by a state board of approval for nursing or vocational programs. Yet an accrediting agency can be established by any group of institutions or any other body that institutions, or programs within institutions, will accept as their source of accreditation. Several institutions denied accreditation by the agency in their geographic region or educational specialty could form their own agency and accredit themselves. To have some assurance that the accrediting and state approval agencies on which it relies for determining eligibility make sound judgments about educational quality, the government has established its own procedures for evaluating the agencies. Therefore, for an institution or program to become eligible for federal funds, through accreditation or state approval, the agency granting accreditation or approval must have been evaluated and placed on a list of recognized agencies by the U.S. Commissioner of Education.[1]

The procedure through which an agency gets placed on the Commissioner's list of recognized agencies is similar in several ways to accreditation. A list of criteria that agencies must meet has been published by the Division of Eligibility and Agency Evaluation (DEAE), the Division within the U.S. Office of Education (USOE) that provides the supporting information for decisions about recognition. An agency wanting to appear on the Commissioner's list requests that recognition by submitting a petition to DEAE describing how it meets each of the published criteria. The agency is then visited by a DEAE staff member or consultant who gathers additional information, and the agency's petition is considered by a 15-person Advisory Committee on Accreditation and Institutional Eligibility appointed by the Commissioner. Representatives of the agency and interested third parties may appear before the Committee to provide clarification or amplification of issues related to recognition. Recognition, if granted, is for a period of from one to four years. At the end of that period, the agency may petition for renewal of recognition. The shorter periods of recognition are granted agencies that have weaknesses in relation to the criteria which the Committee would like addressed and corrected, or improved, before a longer period of recognition is granted.

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[1] With the establishment of the Department of Education, the U.S. Office of Education and the office of U.S. Commissioner of Education have been abolished. Presumably, unless the procedures for establishing eligibility for federal funds are changed legislatively, the procedures for evaluating agencies and publication of the federal list of recognized agencies will continue, although a different federal official will have responsibility for promulgating the list of recognized accrediting and state approval agencies. Since no change had been made and no official designated to assume responsibility for the list of recognized agencies as of the writing of this report, reference throughout will be to the U.S. Commissioner of Education as the responsible federal official and to the U.S. Office of Education as the responsible federal agency.

While the present form of the recognition process was established in 1968, its origins are almost as old as those of accrediting, which goes back to the early years of the present century. It was a time when the U.S. Bureau of Education was under pressure to evaluate and classify colleges and universities accoording to levels of merit. The more immediate origins of the current process, however, were in the passage in 1952 of a bill extending the GI Bill of World War II to Korean War veterans. Congress was concerned that some veterans might be duped into using their federal educational allowances in fraudulent or inadequate programs, as had happened with the first GI Bill. Limiting federal funds to accredited institutions gives the government some assurance that its funds are being used in education or training programs that are educationally and financially sound. Since accrediting agencies are private as well as voluntary, the government remains outside the process of specifying curricular or instructional form or function, areas from which it is constitutionally excluded.

Some close variant of the following language, authorizing federal funds for higher education, appears in more than 20 separate pieces of legislation enacted since 1952.

> For purposes of this (chapter, section, or subsection), the Commissioner shall publish a list of nationally recognized agencies or associations which he determines to be reliable authority as to the quality of training offered by an educational institution . . .

The criteria for determining which accrediting agencies to list were developed by USOE in consultation with the American Council on Education. These were published in the Federal Register of October 4, 1952, with a list of six regional and 22 national or specialized agencies which were given formal recognition as a "reliable authority" by the Commissioner of Education.

In 1965 the list was expanded when the Nurse Training Act required the Commissioner of Education to publish a list of qualified state agencies that approved nursing programs. In 1972, a third list was required, this one for state agencies approving public postsecondary vocational education. Separate criteria, much like those for postsecondary education overall, were developed for each of these groups of state approval agencies.

Each year, a revised list of recognized accrediting and state approval agencies is published, incorporating the results of the preceding year's decisions by the Commissioner, which follow closely the Advisory Committee's recommendations. With the list are published the current criteria for recognition, last revised in 1974. Every agency must request renewal of its recognition and placement on the Commissioner's list at least every four years, and must be reevaluated by the DEAE staff and the Advisory Committee. The frequencies of decisions of different types since 1968, the year in which the current eligibility procedures were instituted, are shown in Table 1. The 234 decisions applied to more than 100 different agencies, most of them having been evaluated more than once.

TABLE 1

Frequencies of Advisory Committee Recommendations, 1968-78

Decision	Frequency	Percent
Recognition for 4 years	80	34.2
3 years	24	10.3
2 years	37	15.8
1 year	49	20.9
Petition denied	35	15.0
Show cause why recognition should not be revoked	8	3.4
Petition withdrawn	1	0.4
Total	234	100.0

Recognition by USOE, like accreditation of an institution or program, is technically voluntary, but there are powerful incentives for some accrediting agencies to achieve recognition. Accreditation by a recognized agency makes an institution's students eligible for federal grants and loans--an annual source of billions of dollars in student aid--and makes the institution eligible for grants from other federal programs of assistance to higher education. Many programs and institutions therefore have felt impelled to seek accreditation by recognized agencies. The separation of accreditation into regional and specialized agencies dilutes that effect, however, since students enrolled in colleges or universities accredited by a regional association are eligible for federal assistance whether or not their particular program is accredited by a recognized specialized agency. Programs in forestry, home economics, or chemistry, for example, need not be accredited by their respective professional associations for their students to be eligible for federal assistance if the programs are part of a college or university accredited by a regional association. Some agencies, therefore, have not sought recognition by USOE.

For other accrediting agencies, however, recognition is critical. Business schools, for example, or schools in data processing, medical technology, or law that are not attached to an accredited institution can most easily become eligible for federal assistance by being accredited by a recognized agency. Although other roads to eligibility are available, accreditation by a recognized agency is the preferred one.

While eligibility for federal financial aid is the dominant inducement for accrediting agencies to seek recognition, it is not the only one. Another determining consideration is that other federal agencies also use the Commissioner's list to identify reputable accredited institutions. Among them, for example, are the Immigration Service (when admitting foreign students), the Department of Defense (when approving civilian training for people on active duty), and the Civil Service Commission (in determining an applicant's eligibility to sit for certain examinations).

Recognition has also taken on some appearance of status. Just as accreditation is often considered by laymen to distinguish superior from inferior institutions, so recognition is considered by some to be a mark of quality, and recognition is sought whether or not it affects student or institutional life in any concrete way. Thus appreciable consequences--both tangible and intangible--follow upon the recognition of accrediting agencies by the Commissioner of Education. And the process whereby recognition and appearance on the Commissioner's list is either conferred or denied assumes a corresponding importance.

The number of accrediting associations or commissions recognized through appearance on the Commissioner's list grew from the 28 original agencies in 1952 to 70 in 1978. An additional ten state boards of vocational education and eight state boards of nursing appear on separate lists. During the decade from 1968 to 1978, federal assistance to higher education through programs administered by the Office of Education, which excludes veterans' educational benefits, grew by a factor of five, from one-half billion dollars to 2.5 billion. The link between expenditure of these funds and accrediting has been to a large extent responsible for the growing scope and importance of USOE's process for recognizing accrediting agencies. With that growth, concern for the effectiveness of the process has increased as well.

THE PURPOSES OF THE STUDY

The primary purpose of the present study was to assess the validity and reliability of the criteria and procedures used by USOE's Division of Eligibility and Agency Evaluation (DEAE) in determining which accrediting agencies and state boards of approval to recognize and for how long. There were, in addition, several related purposes: To assess the effect of the recognition process on accrediting; to develop recommendations for modifying the recognition process, with particular attention to how the criteria for recognition might be weighted differently in arriving at a decision; and to review the history of USOE's role in recognizing accrediting agencies, with particular attention to the relationships and differential functions of the federal government, state agencies, and accrediting agencies in maintaining educational quality. Each of these parts of the study was carried out in relation to the purpose of recognition as defined in the legislative mandate to the Commissioner of Education. The historical review of the criteria is Part II of this report.

II. DEFINITIONS

Validity and reliability, the critical concepts in the evaluation of the recognition process, have specialized meanings which depend on context; they also, however, have general uses in common discourse. In the context of the present study, the definitions are those pertinent to measurement or assessment. Those definitions, however, are close to the meanings of the terms as they are used in everyday discourse, and they can be understood in the context of common language.

VALIDITY

In common discourse, validity refers to the degree of truth inherent in a judgment or assertion. A valid statement is a true statement. While in logic a statement or argument is either valid or invalid, with no intermediate position possible, in measurement validity is virtually never total, but varies from zero to almost complete validity. In its measurement usage, validity is the degree of confidence that can be placed in an inference by virtue of available evidence. With respect to the recognition process, validity is the degree of confidence with which inferences can be drawn about the merit of accrediting agencies on the Commissioner's list as a result of supporting evidence.

Defined as above, several important aspects of validity follow. Validity in this construction applies neither to the process nor to the criteria directly, but to the inferences drawn from them. Some inferences may be valid and others invalid, and in this context even the valid inferences will still hold some degree of uncertainty. When general, abstract qualities, such as the ability of an accrediting body to evaluate the quality of educational programs, are inferred from limited observations, the "truth" of those inferences can never be unassailable, but the degree of confidence they command can be increased with added supporting evidence.

The validity of the recognition process must refer to inferences about educational quality, since determination of educational quality is the legislated purpose of the Commissioner's list. Further, the inferences drawn and their degree of validity must rest on some body of evidence. The process of validation, and a major task of the present study, is to provide evidence that the recognition process distinguishes effective from ineffective agencies as evaluators of educational quality.

Since validity is a property of the inferences drawn from a process rather than a property of the process itself, any process can have as many validities as there are inferences that people choose to draw, and for which evidence can be adduced. The validities of primary interest, though, are those related to the intended purposes of the process, in this case the merit of an agency's judgments of educational quality.

A major task in the present study was to develop evidence that would support the use of the recognition criteria and procedures in determining the ability of an agency to make reliable judgments about quality of education. The inferences to be validated, therefore, were those related to judgments of educational quality. If Congress wants the Commissioner of Education to minimize the ineffective use of federal funds intended for educational aid, a valid process is one which makes certain that educational funds are directed to reputable, effective programs and institutions. Thus the common and technical uses of validity are congruent.

The most direct approach to determining the validity of a process is to observe whether the inferences drawn from it can be supported. The validity of an employment selection process, for example, might be assessed by comparing the job performance of persons selected by the process with that of persons who had been rejected by the process but were hired anyway. Despite the complexity of definitions of job performance and the variety of other considerations that enter hiring practices, such as compatibility with other employees, the validation of employment processes is fairly straightforward compared with the validation of the recognition process. There are no clear performance standards for accrediting agencies or for judgments of educational quality against which the success of the recognition process can be checked.

Ideally, validating the recognition process would take the form of observing and evaluating a sample of accrediting actions taken by a sample of agencies. The recognized agencies would be observed making predominantly "good" judgments, while the agencies denied recognition would be observed making a higher proportion of "bad" judgments. How high a proportion of "bad" judgments should lead to denial of recognition would then be another matter for judgment.

No practical procedure exists, however, for observing and evaluating a large sample of agency decisions. Even if such a procedure could be carried out, there is no strong consensus about the standards of educational quality against which the "goodness" of accrediting decisions could be evaluated. Evidence to support or dispute the inference that accrediting agencies on the Commissioner's list were better judges of educational quality than those denied recognition therefore had to be indirect.

RELIABILITY

In a context of measurement or assessment, reliability is the comparative absence of error. Since some degree of error is always present in judgmental processes, reliability, like validity, is rarely perfect. Reliability is reduced, or error introduced, by any discrepancy between a judgment or assertion and what would generally be accepted as factual. While validity refers to the confidence that can be placed in the inferences drawn from information presumed to be factually correct, reliability refers to the degree of correctness of the information.

As an example, an agency might be denied recognition partly on the basis that it had exercised racial discrimination in the selection of members of visiting teams. If the agency in fact did not discriminate on racial grounds, there was error in that part of the evaluation process. The frequency with which errors occur over a number of evaluations determines the reliability of the process. Any particular decision, which involves many considerations other than discriminatory practice, might or might not be an accurate judgment of the agency's ability to assess and report on the educational quality of an institution. Denial of recognition to the agency in the example may therefore be correct despite the error. Nevertheless, error in the determination of discriminatory practice introduces some degree of error into the decisions, and a sufficiently high frequency of errors can make the decisions in general too unreliable to be useful. Poor reliability, or error in the information entering decisions, always reduces validity because inferences cannot be better than the information on which they are based. Validity may be poor, however, even when reliability is high if improper or unjustified inferences are drawn from accurate information.

Kinds of Error

A note on the kinds of error that reduce reliability in contrast to those that affect validity may be useful. If an archer scatters his arrows fairly broadly over a target, the dispersion of the arrows around the target is a kind of error analogous to a reduction in reliability. The more tightly clustered the arrows are, the greater is the archer's reliability. If, however, the archer mistakenly shoots at an adjacent target not assigned to him, that error would be analogous to an error in validity, no matter how tightly clustered the arrows were in the wrong target. Every arrow in the bull's-eye of the wrong target adds to the reliability of an invalid performance. Error that affects reliability is associated with inconsistency. Inconsistency in the recognition process thus indicates reduced reliability regardless of what the true state of affairs may be.

Many of the errors in the recognition process are difficult to observe directly for a variety of reasons. Although it is true that some factual errors in DEAE reports prepared for the Advisory Committee are corrected by agency staff at the Advisory Committee's meeting, other kinds of errors are not easily amenable to correction. These errors are the ones that arise from agencies' interpretations of the kinds of information pertinent to each criterion, DEAE staff members' interpretations of the information they were given, Advisory Committee members' interpretations of the reports of DEAE staff members, and interpretations by all these groups of the meaning of the various criteria.

When assertions or interpretations cannot be checked against concrete facts, the degree of error is estimated by comparing independent perceptions of the same object. When there is variation or inconsistency in such perceptions, error is assumed without regard to which perception might be the "true" one. In the present study, therefore, determinations of reliability were based on various observations of consistency--between the judgments of different kinds of judges, different observations, and different occasions on which the judgments were made.

III. GENERAL APPROACH TO THE STUDY

An immediate problem in planning the study was the specification of what was to be evaluated. The published criteria and DEAE's procedures in implementing them, which led to recognition decisions, were the entities to be evaluated, but these are difficult to observe except superficially. The criteria, while published and available to every accrediting agency and to anyone interested in reading them, don't in themselves describe how decisions are reached. Even the judgments of a large panel of experts evaluating the criteria would not have been informative, since extensive expert judgments over a period of years had already entered into the formulation of the criteria. New judgments drawn from the same process could not be expected to provide much information that would be either new or useful.

Direct observations of DEAE's procedures would be far too costly if carried out by systematically observing the staff members who reviewed petitions for recognition, visited agencies, observed visiting teams, and prepared reports. Nor could observations be made of the recognition activities of prior years. And without some organizing set of principles to provide an interpretive framework for such observations, they would not be useful enough to justify their cost.

One reviewer of an early questionnaire, objecting to its elaborateness, asked why accrediting agency directors and other knowledgeable people couldn't simply be asked in a straightforward manner how good the criteria and the resulting recognition decisions were. One answer is that the recognition process is too complex for broad judgments about it to carry much meaning. A judgment that the process was generally good would then have to be elaborated to specify which parts were good, which not so good, in what contexts, and for what reasons. In effect, that is what was done, although the process was elaborated into selected details, and the solicitation of judgments about their value was carried out systematically.

SPECIFICATION OF THE PROCESS

The recognition process starts with an agency submitting a petition for recognition stating how it has complied with each of the published criteria. Customarily, the petition is clarified and expanded through correspondence, through observation of the decision-making body, and perhaps through the observation of a visiting team. All the information available is then organized by staff members of the Division of Eligibility and Agency Evaluation (DEAE) into a report that details how the petitioning agency meets or fails to meet each criterion.

Staff reports are accompanied by a summary which highlights the major issues described in the report. The Commissioner's Advisory Committee reviews the DEAE staff report, listens to a presentation by a representative of the agency who clarifies and elaborates on questionable points, and sends a written recommendation for or against recognition and a brief statement in support of its position to the U.S. Commissioner of Education. Since the staff reports provided the most detailed information on the nature of the discriminations that enter into the recognition decisions, they were made the basis for much of the evaluation, and expert judgments about the recognition process were directed primarily to the detailed contents of the reports. The study also drew on the staff summaries, the Committee's recommendations, and a sample of the initial petitions to fill out an extensive, detailed description of the recognition process and the roles of the various criteria in it.

During the 11 years from 1968 to 1978, 234 separate recognition decisions were made, involving 114 postsecondary accrediting and state approval agencies of various types, as shown in Table 2. Each agency was evaluated from one to five times during that period, with 29 of them evaluated three times or more. Early in the study, a representative sample of 52 of the staff reports that preceded the decisions were read, and each descriptive statement made about the agency was listed with the recognition criterion to which it referred. The statements were reworded when necessary

TABLE 2

Characteristics of Accrediting and State Approval Agencies on which Actions Were Taken, 1968-78

Characteristics	Frequency	Percent
Type of Agency		
Regional	20	8.5
National institutional	40	17.1
Specialized	118	50.4
State vocational	35	15.0
State nursing	21	9.0
	234	100.0
Years of Operation		
Less than 5 years	59	25.2
5-9 years	32	13.7
10-20 years	21	9.0
More than 20 years	94	40.2
Unknown	28	12.0
	234	100.1
Field of Agency		
Medical, Dental, or Allied Health	100	42.7
Other	134	57.3
	234	100.0
Predominant Educational Level		
Less than 4-year post-secondary program	75	32.1
Baccalaureate	7	3.0
Graduate	45	19.2
Mixed	107	45.7
	234	100.0

to make them applicable in principle to any agency, and statements that differed only in minor details were merged into a single general statement. A total of 559 statements resulted, with from 10 to 130 appearing in any single staff report. The more specific of the criteria had only 5 to 7 statements associated with them; the more complex had 25 to 27. Criterion b2iiB, for example, states, "The agency or association publishes or otherwise makes publicly available the procedures utilized in arriving at decisions regarding the accreditation status of an institution or program." This fairly specific criterion was elaborated in the staff reports with one or more of only five separate statements. One such statement is, "The proceedings of the agency's policy/decision-making body are published."

In contrast, Criterion b8 reads, "It (the agency or association) accredits only those institutions or programs which meet its published standards, and demonstrates that its standards, policies, and procedures are fairly applied and that its evaluations are conducted and decisions rendered under conditions that assure an impartial and objective judgment." This criterion required 27 different statements to describe the various pertinent agency characteristics. An illustrative statement is, "Clearly established procedures ensure impartial evaluations and judgments."

Of the 44 criteria, a count that includes the subsections within the more general criteria, 23 had fewer than 10 descriptive statements associated with them. Five had more than 20.

While the statements culled from the sample of 52 staff reports describe the agencies in relation to each criterion for recognition, the statements are not the criteria themselves. Some, for example, describe the organizational structure and purpose of the agency, the number of programs or institutions it has accredited, the length of time it has been operating, and its relationship, if any, to other organizations. They may be simply descriptive of some aspect of the agency related to a particular criterion, with no evaluative implications. Others, while obviously evaluative, may refer to only a small portion of a criterion. One such statement, which refers to only a small part of the criteria related to due process, is, "The agency's written procedures for initial applications for accreditation are not clear."

The 44 criteria were thus elaborated into 559 statements that represented the application of the criteria. Several procedures, described in Chapter IV, were used to group the statements and criteria into broad sets of related criteria. The groups were subdivided into the criteria, which in turn were elaborated into the 559 statements. This organization of the criteria permitted expert judgments to be directed to selected aspects of agencies that represented the full range of information on which recognition decisions were based.

JUDGMENTS

The ultimate authority for any determination of validity, quality, or merit lies in informed judgments. Even when an objective indicator of merit is possible, such as volume of sales in evaluating the performance of stockbrokers, expert judgment is required to identify and define that criterion, to determine its importance in relation to other aspects of performance or to the circumstances of that performance, and in general, to give it meaning within a total context of stockbroker behavior and productivity. The absence of any acceptable objective indicator of the ability of an agency to assess the educational quality of an institution was not, therefore, a genuine hindrance to validation of the process. It only meant that the approach would be to informed judgment directly rather than through intervening indicators.

The quality of judgments can vary appreciably, depending on who the judges are, what is being judged, and how the judgments are made. To ensure that the judgments have value, two types of procedures related to the quality of judgments can be formulated. One type involves the selection of the judges. They must be knowledgeable about the objects being judged; there must be enough of them for their collective judgments to override any peculiarities of particular individuals or unusual groups of individuals; they should be diverse enough to represent the range of perspectives from which the objects judged are likely to be viewed.

The second type of procedure for useful judgments requires clear specification of the objects to be judged and of the nature of the judgments to be made. For example, judgments about an entity as broad and diverse as an undergraudate college must themselves be broad. Even though some judgments about institutions as a whole are necessary and useful, they can often be improved by limiting their scope. If the purpose of the judgments about the college is to evaluate its graduates for admission to graduate programs in political science, a more precise specification of the object to be judged will produce more accurate and useful judgments. The judgments could well be limited to the political science department rather than the college as a whole, and perhaps to the upperdivision political science courses or to the faculty members teaching upper-division political science. Excluding the effect of extraneous aspects of the college from judgments about its political science graduates increases their clarity and accuracy.

Specifying the nature of the judgments to be made further increases their usefulness. A global judgment about the quality of upper-division political science courses at an institution is not as informative as a group of judgments directed to particular contributors to the overall quality. Judgments about the degree to which quantitative methods are drawn on in analysis, or the extent to which political philosophy is incorporated into other areas of political science, for example, will clarify the meaning of any broad judgment of quality. This kind of specification of the nature of the judgments to be made, as well as of the object to be judged, improves the judgments in two ways. The judges are more accurate in their judgments because of the narrowed scope of the judgments they are asked to make, and the interpretations of the judgments are clearer for the same reason.

Most of the informed judgments in the present study were directed to samples of statements that represented the criteria and groups of criteria. The judgments about the importance of specific statements could then be translated into judgments about the criteria. In making their judgments, the judges considered the ability of an agency to assess and report on the educational quality of an institution or program. The judgments were therefore limited to educational quality but were not focused more precisely than that because the recognition process itself is not more sharply defined. The diversity of judgments that appear with respect to a broadly general characteristic is itself useful information in evaluating the merit of that characteristic. Judgments of merit cannot be expected to be more consistent than the definitions of merit.

The judges included executive directors of accrediting and state approval agencies, administrators and faculty members in educational institutions, state and federal officials concerned with some aspect of accreditation, and a mixed group of scholars and critics of accreditation not associated with one of the other groups. Some groups, such as the agency directors, included all identifiable members of the group. Every director of every identifiable accrediting or state approval agency in the country, whether appearing on the Commissioner's list or not, was invited to provide judgments about the recognition process. Other groups were not representative samples but were chosen to provide diversity of viewpoint. The faculty members and administrators, for example, were selected from public and private colleges and universities, large and small, and from proprietary schools offering programs at all postsecondary levels.

In addition to the main purposes of the study, several related goals were pursued, such as analyses of the recognition decisions and of their relationship to various aspects of the agencies, interviews with directors of accrediting agencies, and surveys of the directors designed to elicit their suggestions about how the recognition process might be improved. The specific procedures and their results will be described in the remainder of this report.

IV. THE STRUCTURE OF THE CRITERIA

The current published criteria for recognition of accrediting and state approval agencies by the U.S. Commissioner of Education (Appendix A) have four sections which call for the evaluation of an agency's functional aspects, responsibility, reliability, and autonomy.

Functional aspects refer to the agency's scope of operations, its staffing and organizational and financial structure, and its accrediting procedures, and each of these segments is further elaborated into as many as five more specific criteria.

Responsibility refers to the agency's responsiveness to the needs of its several constituencies and the general public, and is the most extensive of the sections, with approximately 30 specific requirements. These include requirements for making information about the agency publicly available; publishing the procedures it follows in evaluating, accrediting, and withdrawing accreditation; providing a regular process for programs or institutions to appeal adverse decisions; and developing effective standards, maintaining them, and applying them fairly.

Reliability includes four specific criteria--the agency's professional reputation and acceptance, the orderliness and constructiveness of its procedures, its experience, and the inclusion in its affairs of representatives of its constituencies.

Autonomy, including only two specific criteria, is concerned with the agency's exercise of independent judgment and freedom from conflicts of interests.

Some degree of relationship among the criteria is required by their common bearing on educational quality. They necessarily overlap. One of the criteria under responsibility, for example, requires that agencies "take into account the...interests of...the academic, professional, or occupational fields involved." Another criterion, this one under reliability, calls for agencies to reflect, in the composition of their policy and decision-making bodies, "the community of interests directly affected by the scope of its accreditation." While a governing board that includes representatives from all the constituencies affected by its actions does not necessarily assure that all pertinent interests are taken into account, the two criteria are clearly related. Qualities that satisfy the criterion on reliability inevitably have an important effect, no doubt appropriately, on the agency's responsibility. The relationships among the criteria clarify their meaning, pointing out their distinctions as well as their areas of convergence. A preliminary task of the study was therefore to identify the operational relationships among the criteria--their meanings as they are applied in evaluating agencies.

THE DESCRIPTIVE STATEMENTS

A total of 559 statements descriptive of agency characteristics, elaborations of the 44 published criteria, were catalogued after several persons read and reread a random sample of 52 staff reports. These statements, while not synonymous with the criteria, included most of the observations about agencies and the bases on which they were judged to satisfy or fail to satisfy the criteria for recognition. The agency characteristics not catalogued were those that occurred too rarely to be included in a set of statements designed for general application, and those that were brought up in the Advisory Committee meeting by agency representatives or others after the report on the agency under review had been written. The rare statements, while possibly critically important in a particular decision, did not affect the decision process in general. When the issues raised belatedly, at the Advisory Committee's meeting, were pertinent to more than a handful of decisions, they could be depended on to appear in other staff reports.

The statements that contributed in a systematic way to the decisions were those that appeared in the staff reports more often than occasionally and less often than all the time. Even though the 559 statements were formulated to apply generally, many appeared in only a handful of reports, and a few occurred so often that they simply did not discriminate among agencies. The first criterion, for example, requires that agencies be national or regional in geographic scope. The statement that the agency's national or regional scope is clearly defined appeared in 89 percent of the reports, and therefore rarely discriminated among agencies. Only 166 statements appeared in more than 10 percent and fewer than 90 percent of the reports. These 166 statements described much of the variation among agencies associated with recognition decisions, and the total group of 559 probably addressed almost all the pertinent considerations.

Factor Analysis of the Most Discriminating Statements

When several statements consistently appeared together in descriptions of agencies, and rarely occurred if others in the group were not also present, those statements could reasonably be assumed to represent collectively an aspect of the agencies that was more general than the statements themselves. Factor analysis is a procedure through which all the relationships among the statements, or among preselected subsets of them, can be examined systematically to identify those groups that, through their tendency to occur together, indicate general aspects of the agencies. Thus several statements referring to various aspects of an agency's financial situation, if they tended to occur jointly among the total group of agencies, could be merged into a general conclusion about the agency's financial strength. Further, the relationships among those statements in a number of staff reports would indicate that financial strength was a general quality of agencies that entered into the recognition decisions. The groups of mutually related statements, or factors, indicate the structure of the criteria--the distinctions among them and the areas of overlap--as they are applied in the recognition process.

For a factor analysis to produce reliable results, the number of cases (staff reports) in which the variables (statements) to be factored are observed should be four or five times the number of variables. With 234 staff reports, about 50 statements can be reliably factored. The 166 statements that showed at least a moderate degree of variability were therefore formed into six overlapping groups of from 40 to 50 variables each. The groups were formed simply on the basis of judgment as to the kinds of statements likely to be related to one another, or for which the distinctions were unclear. Statements concerned with ethical practice, due process, and autonomy were included in one group. Responsiveness to various constituencies and autonomy were part of another group.

Because of the overlapping content of the six groups, similar factors appeared in more than one group. Those results, without duplicated factors, are summarized in Table 3. Since the factors described in Table 3 were derived from several separate analyses of different groups of statements, they are presented individually. The table gives the identifying number and content of the statements, the number of the criterion to which each statement referred, approximate factor loadings (since the factor loadings varied slightly from one analysis to another), and a descriptive title for each factor. The factor loadings are correlation coefficients between the statements and the factor. For example, Statement 370 shows a correlation of .85 with the general quality of openness or responsiveness represented by the group of statements labeled Factor A.

TABLE 3

Factors of Criterion-Related Statements

A. Openness to Public View; Responsiveness to the Concerns of Interested Groups

Related Criterion		Statement	Approximate Factor Loading*
b2iiE**	370	Description of organizational control is published.	.85
b2iiD	360	Affiliations of board or commission members are published.	.80
c4	700	All constituencies are represented on the board or commission.	.80

TABLE 3
(cont'd)

A. Openness to Public View; Responsiveness to the Concerns of Interested Groups (cont'd)

Related Criterion		Statement	Approximate Factor Loading
b2iiD	69	The names of the principal administrators are published.	.75
b10	650	Instructions are provided to ensure that references to accreditation are accurate.	.70
b1i	280	The interests of all constituencies are considered.	.70
b2i	283	The public is represented on the board or commission.	.60
b2iiB	340	The nature of the decision-making process is published.	.55
b2iii	380	Standards are not revised until interested groups have commented.	.50

B. Due Process

Related Criterion		Statement	Approximate Factor Loading
a2v	190	Visiting teams include at least one person not on the agency staff or commission.	.75
b3viii	490	Accreditation cannot be changed during an appeal.	.75
b2iv	390	Written procedures provide for fair treatment of complaints.	.70
b3viii	510	Reasons are given for adverse decisions on appeals.	.70
b2iii	380	Standards are not revised until interested groups have commented.	.65

TABLE 3
(cont'd)

B. Due Process (cont'd)

Related Criterion		Statement	Approximate Factor Loading
b3vii	470	Reasons are given for adverse accrediting decisions.	.65
b3vi	460	Accreditation is withdrawn only after due process.	.60
b3viii	471	Appeal procedures are published.	.60
b3viii	500	Adverse decisions are followed by a hearing.	.55
b1i	280	The interests of all constituencies are considered	.50
d2	64	Written policies and procedures guard against conflicts of interest.	.50

C. Fair Practice

b8	590	Accreditation procedures are fairly applied.	.75
b8	591	Decisions are fair and consistent with standards.	.75
b8	411	Standards are clear enough to assure fair treatment.	.55
d2	64	Written policies and procedures guard against conflicts of interest.	.45
b7	582	Programs are free to use a variety of educational methods.	.40
b1i	280	The interests of all constituencies are considered.	.40

TABLE 3
(cont'd)

C. Fair Practice (cont'd)

Related Criterion		Statement	Approximate Factor Loading
b3viii	510	Reasons are given for adverse decisions on appeals.	.35
d1	710	No function of the agency interferes with independent judgments	.35
b3vii	470	Reasons are given for adverse accrediting decisions.	.35
b2iii	380	Standards are not revised until interested groups have commented.	.35
b8	610	Doubt exists about the impartiality and objectivity of the decisions.	-.35

D. Evaluation Procedures

Related Criterion		Statement	Approximate Factor Loading
b3i	410	The first evaluation is at the request of the institution's chief executive officer.	.75
b3v	450	At least one visiting team member is present at the evaluation of the report.	.70
b3iv	441	The institution's chief executive officer has an opportunity to respond to the report.	.60
b3ii	272	Visiting teams meet with faculty, administrators, and students.	.60
b3iii	261	Visiting teams provide a written report of strengths and weaknesses.	.55

TABLE 3
(cont'd)

D. Evaluation Procedures (cont'd)

Related Criterion		Statement	Approximate Factor Loading
b9	54	Institutions or programs are regularly reviewed at reasonable intervals.	.45
a3iii	128	Written instructions are provided for the self-study and on-site visits.	.40

E. Evaluation Procedures: Self-study

Related Criterion		Statement	Approximate Factor Loading
a3iii	240	A self-study and on-site visit are required.	.70
a3iii	253	Self-study procedures are not sufficiently critical or analytic.	-.60
a3iii	128	Written instructions are provided for the self-study and on-site visit.	.50
b6	570	Regular reports are required indicating continuing self-evaluation.	.50
a3iii	237	The self-study involves all constituencies.	.45

F. Evaluation Procedures: Maintenance of standards and protection of institutions' interests.

Related Criterion		Statement	Approximate Factor Loading
b8	599	Accreditation is withdrawn when standards are no longer met.	.75
a3iii	243	Visiting teams examine qualitative aspects of an institution or program.	.55

TABLE 3
(cont'd)

F. Evaluation Procedures: Maintenance of standards and protection of institutions' interests (cont'd)

Related Criterion		Statement	Approximate Factor Loading
a2iv	124	Institutions or programs may recommend and reject visiting team members.	.45
d1	743	Board or commission members do not participate in decisions about their own institutions.	.45
b3viii	500	Adverse decisions are followed by a hearing.	.40
b7	582	Programs are free to use a variety of educational methods.	.40
a2iv	129	Visiting teams are trained.	.40
b9	598	Institutions or programs may be evaluated at intervals shorter than the normal cycle.	.35
b3vi	460	Accreditation is withdrawn only after due process.	.35
b3ii	421	The observed visiting team met with all appropriate groups.	.35

G. Organizational Strength

a2i	50	The agency is adequately staffed.	.85
a2i	51	Procedures are timely and effective.	.70
a2iv	170	Competent, qualified people are on the policy or decision-making body.	.45

TABLE 3
(cont'd)

H. Financial Responsibility

Related Criterion		Statement	Approximate Factor Loading
a2ii	71	Fiscal audits are performed regularly and financial statements are published.	.65
a2ii	72	Financial resources are adequate.	.40
a2iii	100	Fees are reasonable.	.35

I. Preaccreditation

a3ii	220	Procedures are provided for the move from preaccreditation to accreditation.	.85
a3ii	236	Preaccreditation is appropriately related to accredited status.	.70
a3ii	225	Preaccreditation requires a self-study and site visit.	.55
a3ii	231	Preaccreditation is for a limited period.	.45
a3ii	206	The agency does not have a pre-accreditation status.	-.70

*The factor loadings can be interpreted as correlation coefficients between the statements and the factors.

**The initial letters in the criterion designations place the criteria in the following groups:

a. Functional aspects
b. Responsibility
c. Reliability
d. Autonomy

The order of the factors is an approximate indication of their contribution to the discrimination among agencies in the DEAE staff reports. The agency attributes associated with Factor A, which is concerned with openness to public view and responsiveness to interested groups, collectively contributed far more to the discrimination among agencies than did those associated with Factor G, which is related to organizational strength. This does not mean that openness or responsiveness is given more emphasis than organizational strength in the recognition process. But agencies vary more with respect to openness or responsiveness, according to the DEAE reports, than they do with respect to organizational strength. Organizational strength is therefore less prominent as a broad discriminating quality than is openness/ responsiveness.

Factor A is associated primarily with statements describing an agency's publication of information about its organizational structure. Compliance with the statements is readily accomplished and readily observed. Ambiguity is minimal. The statements that contribute to Factor B are related more to procedures, safeguards for the accredited institutions or programs, than to organizational structure, but they are also readily complied with and readily observed.

Factor C is associated with statements concerning fair practice. Some overlap with Factor B on due process is to be expected, and some shifting of statements between the two factors might be observed in different samples of agencies. Factors B and

C are each described with 11 statements, five of which are common to both. Nevertheless, due process and fair practice are distinct enough to be separated in the evaluation of accrediting agencies.

Factors D, E, and F are all related to different aspects of the evaluation procedures. Factor D includes several general procedures for evaluation, such as initiating the first evaluation only at the chief executive officer's request, as well as statements describing visiting team procedures. Factor E is related to the self-study. Factor F is a mixture of qualities that are not as coherent as those of the other factors; several of its statements about visiting team procedures seem more appropriate to Factor D. Factors G, H, and I are associated respectively with organizational strength, financial strength, and preaccreditation procedures.

THE CRITERIA AND FACTORS OF STATEMENTS

Of the 44 criteria, 33 are represented by 53 descriptive statements organized in nine slightly overlapping factors. Constituting as they do the major ways in which accrediting agencies are shown to differ in the DEAE reports prepared for the Advisory Committee, the nine factors and their associated statements contain much of the information on which recognition depends.

Below, in abbreviated form, are the eleven criteria not represented in the nine factors. They did not appear because statements associated with them did not vary much among agencies. They may have been given less attention by the DEAE evaluators than they merit; they may, even though important, be so readily satisfied that agencies were universally in compliance; or they may be so difficult to observe that little discriminating information could be drawn from them. Several--must notably a1i--are explicit enough that an agency may learn in preliminary discussions with DEAE staff that it does not at the moment qualify and may withdraw its petition before evaluation. Whatever the reasons, the following 11 criteria may not, except in isolated instances, play an important role in the recognition decisions.

a1i	The agency is national or regional in scope.
a1ii	The agency clearly defines its scope of activities.
a3i	The agency clearly defines each level of accreditation and has clearly written procedures for granting and denying accreditation at each level.
b1ii	The agency's purposes and objectives are clearly defined.
b2iiA	The agency publishes the standards by which institutions or programs are evaluated.
b2iiC	The agency publishes the current status of institutions or programs and the dates of the next scheduled review.

b4 The agency fosters ethical practices concerning refunds and nondiscrimination in admissions and employment.

b5 The agency evaluates its educational standards.

c1 The agency's policies, procedures, and decisions are widely accepted.

c2 The agency regularly reviews its standards, policies, and procedures.

c3 The agency has at least two years' experience as an accrediting agency.

Of the above, Criteria b1ii, b2iiA, and b2iiC--all concerned with published information about the agency--had no more than two statements associated with them that appeared in as many as 10 percent of the staff reports. In effect, each of those three criteria was represented by little more than a statement asserting compliance. From five to seven amplifying or modifying statements were used occasionally, but none was used frequently enough to have a consistent effect on the decisions. Except for Criterion b2iiC, where noncompliance was found in about 10 percent of the cases, only two or three cases of noncompliance with these three fairly uncomplex criteria appeared in the more than 200 evaluations. While occasional failures to comply with these criteria may affect recognition, they are not frequent enough to have an appreciable role.

Criteria a1i, a1ii, and a3i deal with the agencies' scope of operations and clarity of procedures. Each of these has 16 or more statements associated with it, with from 5 to 12 appearing in at least 10 percent of the reports. The instances of mutual occurrence among those statements were not frequent or consistent enough, however, to indicate that they had much effect on the decision process. Like Criteria b1ii, b2iiA, and b2iiC, these criteria were simply and directly observed, with almost all agencies complying.

Criteria b4 and b5, concerned with ethical practices and the evaluation of standards, showed results similar to Criteria a1i, a1ii, and a3i. Although moderate numbers of related descriptive statements appeared in the staff reports, they did not show any consistent pattern of mutual occurrence. These two criteria, which lie within the broad area of responsibility, are far more complex than Criteria a1i, a1ii, and a3i, described above, which are associated with functional aspects. The complexity of b4 and b5, and the absence of any strong relationship among the pertinent statements, may suggest that the meaning and functions of these criteria need further conceptual clarification.

Three of the four criteria associated with reliability are unrepresented in the nine factors. Criterion c3, requiring two years of accrediting experience, is simply defined, and one or two statements adequately describe how an agency does or does not satisfy it. It would be expected to appear in those factors affected by the length of an agency's accrediting experience.

Its absence from the above factors is surprising in view of its association with other agency attributes in the differentiation of agencies described in Chapter V. Criteria c1 and c2 seem, like b4 and b5, to be not well enough formulated to provide for consistent descriptions of the ways in which agencies vary in their compliance or failure to comply.

Several aspects of the ways in which statements were combined into the factors listed in Table 3 bear special consideration. First, there was some arbitrariness built into the statements themselves; whether two similar statements should be retained as separate statements or merged into a single more general one was frequently decided somewhat arbitrarily. The same problem occurs in the recognition process, starting with the criteria themselves. Some criteria are highly specific, leaving little room for variation or elaboration, as for example b3v, which simply calls for a member of the visiting team to be present when the visiting team's report is evaluated. Other criteria are much broader and allow for a variety of elaborative statements, as for example c1, which is concerned with an agency's professional reputation and acceptance. An appreciable number of statements appeared in the staff reports under this criterion, but only a few occurred frequently enough to indicate that the information associated with it was consistent from agency to agency. Thus the criteria themselves range widely in their scope and specificity. The broader criteria, except those which, like c1, elicit statements too varied to have a consistent effect, are most likely to produce the consistent variation required for such factors as appear in Table 3.

In addition to the uncertainties inherent in the criteria, the staff members writing the reports that provide the Advisory Committee with a major part of its information necessarily varied among themselves and over time in the degree of specificity with which they treated each criterion. This variation occurred even though staff members typically conferred in writing the report.

Nevertheless, the criteria resulted from the extensive efforts of a wide variety of people, and differences in the degree of specificity of different criteria can be assumed to have some justification. Similarly, the DEAE staff members were not wholly arbitrary in describing compliance with some criteria in considerable detail and giving others only a brief comment. Since the catalog of statements reflected the content of the staff reports, where the reports were highly detailed comparatively large numbers of statements were required to express the information given.

The nine factors, despite errors and some degree of arbitrariness, represent combinations of statements that tended to vary jointly. They appeared or failed to appear together in the staff reports, and they showed some variability from one report to another. Yet the factors are not, except in a very loose sense, general attributes of accrediting agencies. For example, providing for visiting teams to meet with faculty, administrators, and students is not equivalent to giving the chief executive officer an opportunity to respond to the visiting team's report. But those two conditions tend to occur jointly with each other and with several additional statements that have in common the protection of the interests of the evaluated institution or program. This suggests a general concern in the accreditation process, but not necessarily a persisting or completely coherent agency characteristic.

Another caution may be needed in evaluating the criteria that are absent or poorly represented. An important element in any particular decision may not appear in the nine factors because it was described with only one or two statements, and at the same time was not associated with other characteristics of the agency. Some other important element may not appear because it was described at different times in different ways and so lost any appearance of coherence. The factors therefore may not include every issue of importance in the decisions.

CRITERION FACTORS

Appropriate statements were sometimes omitted in some staff reports because they were implied by other statements, while several quite similar statements were sometimes included in other staff reports. The unsystematic inclusion or exclusion of closely related statements introduces some error into the measures of relationships among statements, and into the nine factors derived from those relationships. This source of error was reduced, and the effects of rarely occurring statements taken into account, by factoring the criteria themselves.

Each of the 559 statements was classified as favorable, unfavorable, or neutral in accordance with the judgment each term would imply about the effectiveness of an accrediting agency. Two Educational Testing Service staff members made independent judgments, and a third was called on to resolve the few disagreements. The favorable or unfavorable nature of most statements was quite clear; the few uncertainties that arose involved statements judged by one person to be neutral. Each statement that applied to a particular criterion in a staff report was scored +1, 0, or -1, depending on whether it was favorable, neutral, or unfavorable. The scores for all the statements associated with a particular criterion were summed, a constant was added to make all the sums positive, and these were assigned to the agencies as criterion scores. Sixteen agencies, for which fewer than 20 statements appeared in the staff reports, were excluded, and 44 criterion scores were assigned to each of 218 staff reports. These 44 criterion scores were then factored (Table 4). Since every statement is associated with at least one criterion, and every statement, however infrequently it may occur, can be assigned a value of favorable, neutral, or unfavorable, the criterion scores utilize the information in every statement.

The first factor in Table 4 is a somewhat general one with which 23 of the 44 criteria showed correlations of .30 or higher. Agencies considered effective in a number of areas tended to be seen as effective in other areas as well. The first 10 criteria listed in the table are particularly likely to be strong characteristics of the strongest agencies. The most general characteristic of the criteria strongly associated with the first factor is a concern for the interests of all constituencies, including the institutions and programs accredited. It is quite similar to the first factor derived from the statements, although that may be because a somewhat undifferentiated general characteristic underlies the statements and the criteria.

The second criterion factor has nine criteria correlated with it at values of .30 or higher, almost all concerned with the evaluation process. In this respect it is quite similar to Factor D of the statement factors (Table 3).

The third criterion factor involves two criteria concerned with reliability--experience and acceptance. The requirement that fees be reasonable is weakly associated both with this and with the

TABLE 4

Criterion Factors

Criterion	Content	Factor Loadings^a				
		1	2	3	4	5
Factor I						
b1i	Interests of all constituencies are considered.	71	01	11	03	10
a2i	Personnel and procedures are effective and timely.	71	35	-01	19	15
b3vi	Withdrawal of accreditation is only for cause.	70	09	13	05	10
c4	Policy and decision-making bodies reflect all constituencies.	69	00	15	06	09
a2v	Visiting teams include nonstaff members.	66	17	01	07	-04
b3viiiB	Hearings before an appeal body are provided.	65	13	11	08	13
d2	Procedures guard against conflicts of interest.	64	07	25	13	07
b2iiD	Names and affiliations of members of policy and decision-making bodies are published.	63	06	20	-03	04
a2iv	Visiting team members, consultants and members of policy and decision-making bodies are competent and selected without discrimination by sex or race.	60	21	-04	10	05
b7	Experimentation and innovation are encouraged.	60	12	-16	21	08
b2iiE	Description of ownership and control is published.	49	16	-02	18	07

TABLE 4

Criterion Factors
(cont'd)

Criterion	Content	Factor Loadings[a]				
		1	2	3	4	5
b10	References to accreditation status must be clear.	44	04	16	06	22
b8	Institutions or programs must meet published standards fairly applied.	39	14	06	08	15
b6	An ongoing evaluation of accomplishment of goals is required.	39	02	-15	15	08
b4	Ethical practices are fostered.	39	14	-08	13	06
b3i	Initial evaluation is at the request of the chief executive officer.	39	33	29	09	15
b3viiiC	Written reports of appeal decisions are provided.	37	04	14	04	01
a2ii	The agency defines its own fiscal needs and provides audited financial statements.	31	28	27	11	19
b3viiiA	Accreditation may not be changed during an appeal.	29	29	00	04	09
b2iv	Written procedures provide for timely treatment of complaints.	25	23	-03	02	-03
b2iiB	Decision-making procedures are published.	20	07	13	01	06
Factor II						
b3iii	A written report on strengths and weaknesses is provided after an evaluation visit.	-04	66	-03	04	-05

TABLE 4

Criterion Factors
(cont'd)

Criterion	Content	Factor Loadings[a]				
		1	2	3	4	5
b3iv	The chief executive officer has an opportunity to comment on the visiting teams' report.	29	59	11	13	08
b9	Reevaluation occurs at reasonable intervals.	24	51	11	-03	01
b3v	A visiting team member is present at the evaluation of the report.	-01	51	18	11	11
a3iiiB	Written and consultative guidance are provided the institution or program and the visiting team.	24	50	11	05	04
b3vii	Reasons are given for adverse decisions.	35	42	03	09	03
b3ii	Visiting teams meet with faculty, administrators, and students.	32	33	21	-08	05
a3ii	Preaccreditation is related to accreditation.	15	25	04	12	24
a3iiiA	The self-study assesses strengths and weaknesses and involves all constituencies.	09	18	-02	13	04
Factor III						
c3	The agency has at least two years' experience.	12	10	75	00	-03
c1	Policies and procedures are widely accepted.	06	17	58	10	10
a2iii	Fees are reasonable.	38	22	45	20	18

TABLE 4

Criterion Factors
(cont'd)

Criterion	Content	Factor Loadings[a]				
		1	2	3	4	5
d1	No function interferes with the exercise of independent judgment.	12	22	24	14	04
Factor IV						
c2	Standards and procedures are regularly reviewed.	13	14	11	68	21
b2iii	Advance notice is given of revisions of standards.	34	04	04	62	-05
b5	Standards are evaluated for validity and reliability.	19	11	11	40	24
b2iiC	Current accreditation statuses and dates of next review are published.	05	00	02	31	-20
b2iiA	Standards are published.	01	01	-10	21	07
Factor V						
b1ii	Purposes and objectives are clearly defined.	48	09	10	10	64
a1ii	Geographic and educational scope are clearly defined.	26	08	05	26	52
Not Associated with a Factor						
a1i	The agency is national or regional in scope.	08	-06	-03	10	00
a3i	Definitions and procedures are clearly stated.	01	06	-04	05	02
b2i	The public is represented on policy and decision-making bodies.	-02	05	-13	04	-04

[a] Decimal points are omitted.

first factor. The two criteria most strongly associated with the third factor did not appear at all in the statement factors. That the most experienced agencies should also be the ones most widely accepted is not surprising. These qualities may not have appeared in the factors of statements because the criterion on experience had comparatively few statements associated with it, and although the criterion on acceptance produced a sizeable number of statements (17), only four appeared in more than 10 percent of the reports. Those four were not strongly enough related to one another to affect the factor structure of the statements, yet they and the 13 infrequently used statements apparently produced scores for the criterion on acceptance that were reliable enough to show a relationship with experience.

The fourth criterion factor is associated with the maintenance and evaluation of standards. Of five criteria directly related to standards, four had their highest loadings on this factor. The fifth, b8, which is concerned with the fairness with which standards are applied, was weakly associated with the first factor but not at all with the fourth.

The absence of a factor in the statements associated with standards is surprising. One such factor had appeared in a preliminary factor analysis of the early set of 52 staff reports from which the statements were drawn. Yet the later analyses of more than 200 reports failed to show that factor, even though the five criteria concerned with standards included a total of 50 different statements. Of these 50, 20 were entered into the factor analyses. Rather than forming a coherent factor, however, these statements tended to scatter among the other factors, primarily the one related to fairness. Statements about the fairness with which standards are applied; the consistency with which decisions reflect the agency's standards; the clarity of the standards and its role in ensuring fair treatment; and the involvement of all constituencies in the revision of standards were all associated in Factor C with other statements reflecting fairness and integrity.

Functions related to standards are reflected in five of the 44 criteria, four of which show their interrelatedness in the fourth criterion factor. That the statements concerned with standards did not themselves form a distinct factor, but instead spread over several other factors, raises questions about the pertinence of the observations that lead to the judgments about compliance with the criteria on standards. One possibility is that the criteria may not have been defined clearly enough, and another is that the inherent difficulties in making the necessary observations about standards are so great that they preclude the development of statements that will show the expected relationships. This issue is developed further in Chapter VII.

The fifth criterion factor included only two criteria, both concerned with the agencies' clarity of purpose and scope. Neither is represented in the statement factors, probably because of their specificity. Only a few statements about the compliance or noncompliance of agencies with these two criteria were made with any appreciable frequency.

IMPLICATIONS OF THE FACTORS OF STATEMENTS AND CRITERIA

The two sets of factors--the factors based on the statements directly and those based on criterion scores derived from the statements--lead to several sets of judgments about the criteria. They define the content of the criteria in terms of the observations on which judgments about an agency's ability to determine educational quality are based. Fair application of standards, for example, which is a part of Criterion b8, also incorporates elements from other criteria. It implies, in addition to decisions that are consistent with standards and fair procedures (Criterion b8), clear definitions of standards (Criterion b2iiA) and protection against conflicts of interest (Criterion d1) or other forces that might interfere with independent judgments (Criterion d2). The overlapping of several criteria is not undesirable, but rather demonstrates relationships among issues that should be considered in judgments about an agency's compliance with any particular criterion.

The two sets of factors point up potential gaps or weaknesses in the application of the criteria. Criteria that were not associated with at least one set of factors were probably not contributing to the necessary discriminations among agencies. Only three criteria were missing from both sets of factors--a1i, a3i, and b2i--which were concerned, respectively, with the agency's geographic scope, the clarity of its accrediting procedures, and representation of the public on its policy and decision-making bodies. These three were missing from the factors because almost all agencies complied with them without question. Although they were considered in the evaluations of the agencies, they did not provide enough variability to contribute except occasionally to the discriminations among agencies.

Criteria c1, c2, and c3 were missing from the factors based directly on statements, but not from the criterion factors. Criterion c3, requiring at least two years' experience, was met by virtually every agency petitioning for recognition and requires no elaboration. Criteria c1 and c2, however, are less clear. Criterion c1 calls for wide acceptance of the agency's policies and procedures, and Criterion c2 requires regular review of the agency's standards to ensure that they are constructive, important, and pertinent to educational quality. Each had an appreciable number of statements associated with it, but the statements were not associated with each other strongly enough to contribute to statement-based factors. This suggests some uncertainty about how to observe or evaluate either wide acceptance or the strength of an agency's program to keep its standards current and relevant to educational effectiveness.

Criteria b4, b5, b6, and b7 appear, with the exception of b4, in both sets of factors; all contribute to the discrimination among agencies. Criterion b4, concerned with the fostering of ethical practices, is weakly associated with the general factor among the criteria, the factor that reflects the agency's general effectiveness, responsiveness, and attention to due process. Like Criteria c1 and c2, the ethical practice criterion (b4) may require greater specification of the kinds of observations that will indicate compliance. The other criteria mentioned above are related to the agency's evaluation of its standards for validity and reliability (b5), attention to the institution's or program's evaluation of its educational product (b6), and encouragement of experimentation and innovation (b7). All have statements that are scattered among the factors, suggesting either that those criteria should be clarified and appropriate kinds of observation identified, or that they should be incorporated into the other criteria with which they are related. Criterion b5, for example, concerning the assessment of the validity and reliability of the agency's standards, might well be made a part of Criterion c2, which involves the regular review of the agency's standards and procedures. The evaluation of standards would still need clarification, but associating that process with a review of the effectiveness of the evaluative process as a whole might aid in that clarification.

The two sets of factors also suggest some questions: Is the scope or coverage of the criteria sufficiently broad? And do the criteria incorporate all the important considerations that should enter into determinations of agency effectiveness in judging educational quality? Both sets of factors help define the existing criteria, thus aiding in the identification of neglected areas of importance. For example, criteria associated with the responsiveness of the agency to its various constituencies do not include issues of consumer protection. Although there is no consensus about whether this matter is a proper concern of accrediting agencies, its absence from the factor associated with responsiveness, where it would be expected to appear if included in the criteria, is clear.

Another judgment that can be made on the basis of the factor analyses involves the organization or structure of the criteria. Identification of the system of relationships among the criteria, which the factor analyses provide, can aid in clarifying the meaning of the criteria generally.

Much of the systematic variability in agencies, the bases for discriminations among them, is described in the factor analysis results. The variability is associated with the openness of the agency's structure and procedures to public view, its responsiveness to the interests of the agency's various constituencies, its exercise of due process in accreditation decisions, and its fair application of evaluative standards and procedures. These four phrases account for six of the nine factors into which the descriptive statements can be organized, and for the first two of the criterion factors. Some additional variability, represented in the last three statement factors, is associated with organizational strength, financial responsibility, and preaccreditation procedures. The three additional criterion factors are concerned with experience and acceptance, the review and revision of standards, and definition of purposes and objectives.

The description of the structure and content of the criteria as they are applied is important for two reasons. First, it reveals the degree to which the discriminations among agencies reflect the full range of the criteria. In this respect the recognition process performs quite well. All the criteria except three contribute to the distinctions among the agencies as they are described to the Commissioner's Advisory Committee. The three exceptions are all explicit criteria, simply met and readily observed, which prevented them from contributing to the variability among the agencies. Second, it points out areas within the criteria that lack conceptual clarity. Here some problems with the criteria were observed.

Two related critical questions will be dealt with in subsequent sections of this report. One is whether the distinctions among the agencies described in the staff reports to the Advisory Committee were appropriately and consistently reflected in the recognition decisions. The other question is whether there was agreement among knowledgeable persons that the distinctions among agencies that determine the granting or denial of recognition are appropriate indicators of an agency's ability to evaluate educational quality.

A RESTRUCTURING OF THE CRITERIA

A suggestive grouping of the criteria, presented below, was derived from the factor analyses, judgments of the importance of many of the statements (Chapter VI), a geometric representation of the distinctions that appeared among the agencies (Chapter V), and from a subjective sense of the content of the criteria. That arrangement places the existing criteria into three broad areas--organization and scope, accrediting procedures, and responsibility. These three areas are concerned respectively with an agency's operational structure, purpose, and context; the procedures it uses in evaluating and accrediting programs or institutions; and the way it exercises its responsibility to its various communities of interest, including the general public. The areas differ in scope, moving progressively from internal characteristics of the agency to concerns for its immediate constituency--the programs or institutions with which it deals--to concerns for its broader constituencies. Each broad area is elaborated into three more detailed sets of criteria. The criteria are paraphrased for brevity, with their present designations given in parentheses.

I. Organization and scope

  A. Scope and clarity of purpose

    1. Geographic scope is national or regional (a1i).

    2. Functional scope and purposes are clearly defined (a1ii, b1ii).

  B. Organizational strength

    1. Staff is competent and large enough for the demands placed on it (a2i).

    2. Visiting teams, consultants, and board members are qualified (a2iv).

    3. Policies and procedures are widely accepted (c1).

    4. The agency has at least two years' experience (c3).

  C. Financial strength

    1. Financial resources are adequate (a2ii).

    2. Fees are reasonable (a2iii).

II. Accrediting procedures

  A. Accreditation

    1. Accrediting procedures are clearly defined (a3i).

    2. Preaccreditation is related to accreditation (a3ii).

    3. Written and consultative guidance is provided to programs or institutions (a3iiiB).

  B. Evaluation

    1. Self-study

      a. A self-study is required (a3iii).

      b. The self-study evaluates the strengths and weaknesses of the program or institution (a3iiiA).

      c. The agency gathers information showing a continuing program of evaluation of outputs (b6).

    2. Site visit

      a. An on-site visit is required (a3iii).

      b. Visiting team members are knowledgeable and qualified (a2ivA).

      c. Visiting teams are given written and consultative guidance (a3iiiB).

      d. Visiting teams meet with faculty, students and administrative staff (b3ii).

  C. Standards

    1. A program to evaluate the agency's standards is maintained (b5, c2).

    2. Reactions to proposed revisions of standards are solicited (b2iii).

3. Only qualified programs or institutions are accredited (b8).

III. Responsibility

A. Responsiveness

1. The interests of all constituencies and the general public are considered (b1i).

   a. All directly affected constituencies are represented on the governing board (c4).

   b. Representatives of the public are on the governing board (b2i).

2. Standards, procedures, and organizational information are published (b2ii).

3. The agency fosters ethical practices (b4).

4. Experimentation and innovation are encouraged (b7).

5. References to accreditation must be clear (b10).

B. Due process

1. Written procedures provide for equitable review of complaints against programs or institutions (b2iv).

2. Accreditation is withdrawn only for cause and after due process (b3vi).

3. Specific reasons for unfavorable decisions and notification of the right to appeal are given (b3vii).

4. Appeal procedures are provided (b3viii).

C. Fairness, impartiality

1. Standards and procedures are fairly applied; decisions are impartial and independent of outside influence (b8, d1).

a. Operating procedures protect against conflicts of interest (d1, d2).

b. Visiting teams include at least one person not connected with the agency (a2v).

All the current criteria are included in the above list. In several cases elements from two different criteria have been combined, such as b8 and d1, both concerned with impartiality. In other cases a single existing criterion has been split, with parts of it assigned to different criteria. Criterion a3iii, for example, has been separated into those components associated with the self-study and the site visit.

If the suggested structure is to be useful, the components at each hierarchical level should be roughly equivalent in scope or importance, with the higher levels encompassing all the issues with which recognition should be concerned. The lower-level components should specify the scope and content of the broad issues. Periodic modifications in the criteria can be expected primarily at the lower levels. Greater elaboration would increase both the reliability and validity of the judgments about the higher-order criteria, particularly those that are difficult to observe.

V. DIFFERENTIATION OF AGENCIES

Recognition decisions are intended to differentiate among accrediting agencies in terms of their effectiveness as evaluators of educational quality. The validity of those decisions lies in the empirical justification for inferring that different degrees of strength in educational evaluation are associated with different decisions. To assess the validity of the recognition process, therefore, one step was to identify the distinctions among accrediting and state approval agencies described in the DEAE staff reports--the distinctions on which recognition decisions are largely based.

In one sense, the published criteria define the pertinent differences among agencies, and the more detailed statements drawn from the reports provide further elaboration. The clarity of the distinctions is reduced, however, by the redundancy in the criteria and the statements. For example, Criterion b8 requires fair application of agency standards and impartial accrediting decisions. Criterion d1 requires agencies to be autonomous enough to produce "independent judgment(s) of the quality of an educational program or institution." Discriminations among agencies can depend on whether these criteria describe different characteristics, or whether impartial decisions and fair application of standards necessarily imply that judgments are reached independently of external pressures.

PROCEDURES FOR DESCRIBING AGENCY DIFFERENCES

Because the nonredundant distinctions consistently found in the staff reports reflect the actual application of the criteria and provide much of the ground for the recognition decisions, a procedure was required to identify and describe them. Two complementary procedures were followed, one more sensitive to the large distinctions, and the other more sensitive to the smaller, more minor distinctions. Both procedures start from measurements of the overall degree of similarity or difference among the objects being examined. Only the first procedure, multidimensional scaling, is described. The second, cluster analysis, because it focuses on the minor distinctions among agencies, formed small clusters which showed little generality from one analysis to another. Instead, they seemed to reflect whatever qualities happened to be common to a few agencies in the particular group being analyzed. When the small clusters were formed into larger ones, they agreed well with the spacing of agencies in the first type of analysis--multidimensional scaling (MDS). Therefore, since MDS is more descriptive than cluster analysis of the large differences among agencies, since the small differences emphasized by cluster analysis were not stable from one analysis to another, and since the large clusters supported but did not add to the information in the multidimensional scaling analysis, only the MDS results are reported.

The MDS Procedure

Once the overall differences among a set of objects have been expressed quantitatively, multidimensional scaling will identify a small number of dimensions that may account for much of the variation among the objects. In a lucid, general description of multidimensional scaling, Subkoviak (1975) described how a set of guesses people made about the comparative distances between American cities could be analyzed to produce a moderately accurate map of the United States. Many judged distances between pairs of cities were reduced to two dimensions on which the cities were placed in locations that well matched their actual geographic locations. Similarly, measures of the overall differences among the agencies, derived from the DEAE staff reports, led to a mapping of the agencies onto a few dimensions that account for much of the systematic variation in agency characteristics. Their origin in the staff reports made those dimensions reflect the major distinctions among agencies that commonly enter the recognition decisions.

While the spatial representation of the agencies revealed the most commonly applied bases for the recognition decisions, the information it organized from the staff reports was neither complete nor entirely accurate. Agency representatives provided supplementary information at Advisory Committee meetings that had not appeared in the staff reports. Such belated information, of course, could not appear in the MDS results. That its omission has not distorted the MDS representation of the actual decisions is suggested by the fact that the Advisory Committee has recommended denial of recognition three times as often as has the DEAE staff. If the supplementary information from the agencies had had an appreciable effect on the decisions, the Committee's recommendations would have been more favorable than the staff's.

Another kind of information lost in the MDS analyses consists of the unique or unusual ways that an agency might fail to meet one or more of the criteria. The differences among agencies that provided the starting point for the MDS analyses depended on the relative number of commonly used descriptive statements that distinguished one of a pair of agencies from the other. Statements that appeared rarely in the staff reports did not have any great effect on the measured differences. For example, the following statements appeared from one to four times in the 234 staff reports analyzed:

> No systematic review of instruction, resources, management, or student services is done which results in a written report.
>
> Standards by which the quality of programs is judged are ambiguous or unclear.

> The agency is generally judged to be unreliable; its actions are considered questionable.
>
> The accreditation conferred by the agency has been distorted by political expediency.

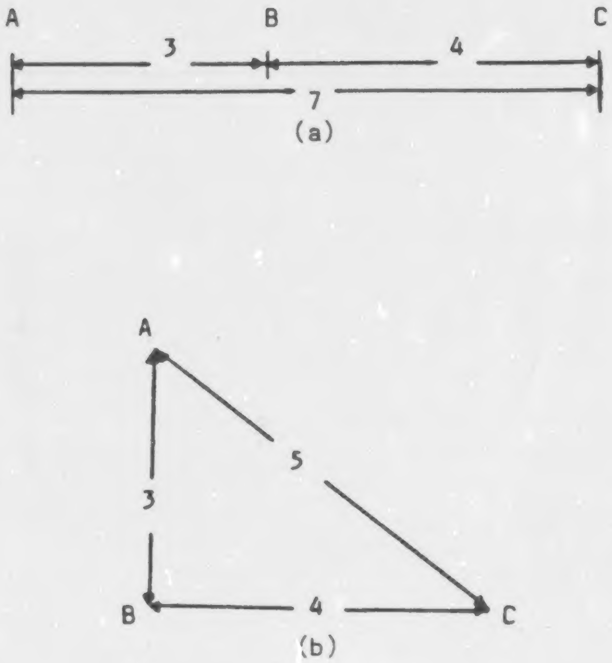
Any of these agency characteristics might have been influential in a particular decision to deny recognition. Yet because of their infrequent appearance, they did not have any appreciable effect on the MDS results, which reflect commonly observed differences among agencies.

The four statements cited above appeared in ten different staff reports, with no more than one of them appearing in any single report. Six of the ten decisions were to deny recognition. The other four were for recognition for one, two, three, and four years.

Important information about particular decisions is clearly lost in analyses based on common differences among agencies, since rarely occurring qualities may be influential in the decision but not in the analyses. This lost information is not critical, however, because the study is concerned with the nature of the recognition process as a whole. Of interest are the qualities that consistently discriminate among agencies rather than those that only rarely affect a decision. In every staff report in which one of the above statements appeared, a number of other statements appeared that not only provided a more complete, coherent view of the agency, but were repeated frequently enough in reports on other agencies to have an effect on the MDS results.

The differences between pairs of agencies, from which the MDS analyses started, were the inverse of a measure of similarity. That measure was based on the proportion of the total number of statements made about any pair of agencies that were common to both. For example, if 30 statements were used to describe both agencies in a pair, and if each agency had an additional 30 statements that described it but not the other, half of each agency's descriptive characteristics would be shared with the other agency. As the proportions of the agencies' shared qualities increase, the agencies' similarity increases and their difference decreases. The measure used to quantify the similarity among agencies was kappa (Fleiss, 1973). It takes into account the total number of possible statements that can be made about an agency--in this study 559--and adjusts the measure of similarity for the number of statements that would occur in common by chance. Thus instead of a similarity of .50 between the agencies in the above example, indicating that half of each agency's described qualities were shared with the other, the similarity calculated as kappa was .44. That reduction accounts for the fact that some small number of common statements would appear in two samples of 60 drawn randomly from a total of 559. If similarity is interpreted as closeness and dissimilarity or difference as separation or distance, agencies will be close together when they have been described in similar phrases in the DEAE staff reports. Agencies described in terms that have little in common can be considered to be widely separated or distant. After the distance between every possible pair of agencies was determined, the agencies were placed, through multidimensional scaling, in a space of several dimensions. The number of dimensions required to accommodate all the agencies, with relatively little distortion of the distances between them, indicated the number of independent sets of distinctions between agencies. The characteristics of the agencies located at extreme positions on those dimensions then indicated the nature of the distinctions that had been made.

The way in which the distances between agencies determined the number of dimensions needed to accommodate them is illustrated in Figure 1. The distances between points A and B and points B and C are respectively 3 and 4 units in both parts of the figure. In Figure 1(a) the distance between points A and C is 7 units; in Figure 1(b) it is 5. If only the two sets of distances are known, the two representations of Figure 1 can be plotted, one requiring only one dimension and one requiring two.



(a)

(b)

Figure 1

One-dimensional and two-dimensional
plots of three points

In problems involving estimates of distance or closeness, as is the case in measuring similarity between two agencies in terms of the proportion of their commonly shared descriptive statements, error makes determination of the number of dimensions imprecise. Judgment must therefore be exercised to determine how many dimensions represent a useful ordering of the objects and how many are simply the result of error in the estimates of distance.

In the present study, at least two dimensions were invariably required to represent the differences among agencies described in the staff reports. For some groups, three dimensions gave a more reasonable picture.

The complexity of the MDS calculations increases exponentially as the number of agencies analyzed is increased. The number of agencies included in any single analysis was therefore limited to about 50. The agencies were grouped for the MDS analyses according to the set of criteria being applied to them. The regional agencies that accredit colleges and universities as total institutions and the specialized agencies that accredit occupational or professional programs, or in some cases specialized institutions, were examined in relation to two sets of criteria--the criteria published in 1969 and the 1974 revision. A few agencies in 1968 and early 1969 had the pre-1969 criteria applied, but they were too few to justify separate treatment. The state boards of approval for vocational education and the state boards of nursing were recognized under two slightly different sets of criteria. Thus four natural groupings for analysis existed--agencies evaluated under the 1969 criteria, the 1974 criteria, the nursing criteria, and the vocational criteria. When all agencies were analyzed together, the result was a two-dimensional space with the comparatively large number of regional and specialized agencies near the center of the space, the state vocational boards clustered at the end of one dimension, and the state nursing boards clustered at the end of the other dimension. The nature of the criteria applied produced such great distinctions in the descriptions of different types of agencies that differences among the agencies within those three groups were lost.

The agencies that made up the largest single group were the regional and specialized agencies evaluated according to the 1974 criteria. Because the agencies evaluated in 1974 could have had either the 1969 or 1974 criteria applied to them, 86 regional and specialized agencies evaluated from 1975 to 1978 were analyzed in two randomly formed groups of 43 agencies each.

TWO DIMENSIONS OF AGENCY DIFFERENCES

Figure 2 shows a group of 43 regional and specialized agencies, evaluated between 1975 and 1978, which have been plotted on two of three dimensions derived from an MDS analysis of their similarities and differences as described in the CEAE staff reports. Each number or letter in the figure indicates the recognition decision for a particular agency, and its location in the two-dimensional space indicates the agency's characteristics with respect to those two dimensions in relation to the other 42 agencies. The numbers 1 to 4 indicate recognition for that number of years. The letter D indicates denial of recognition, SC a request for the agency to show cause why its recognition should

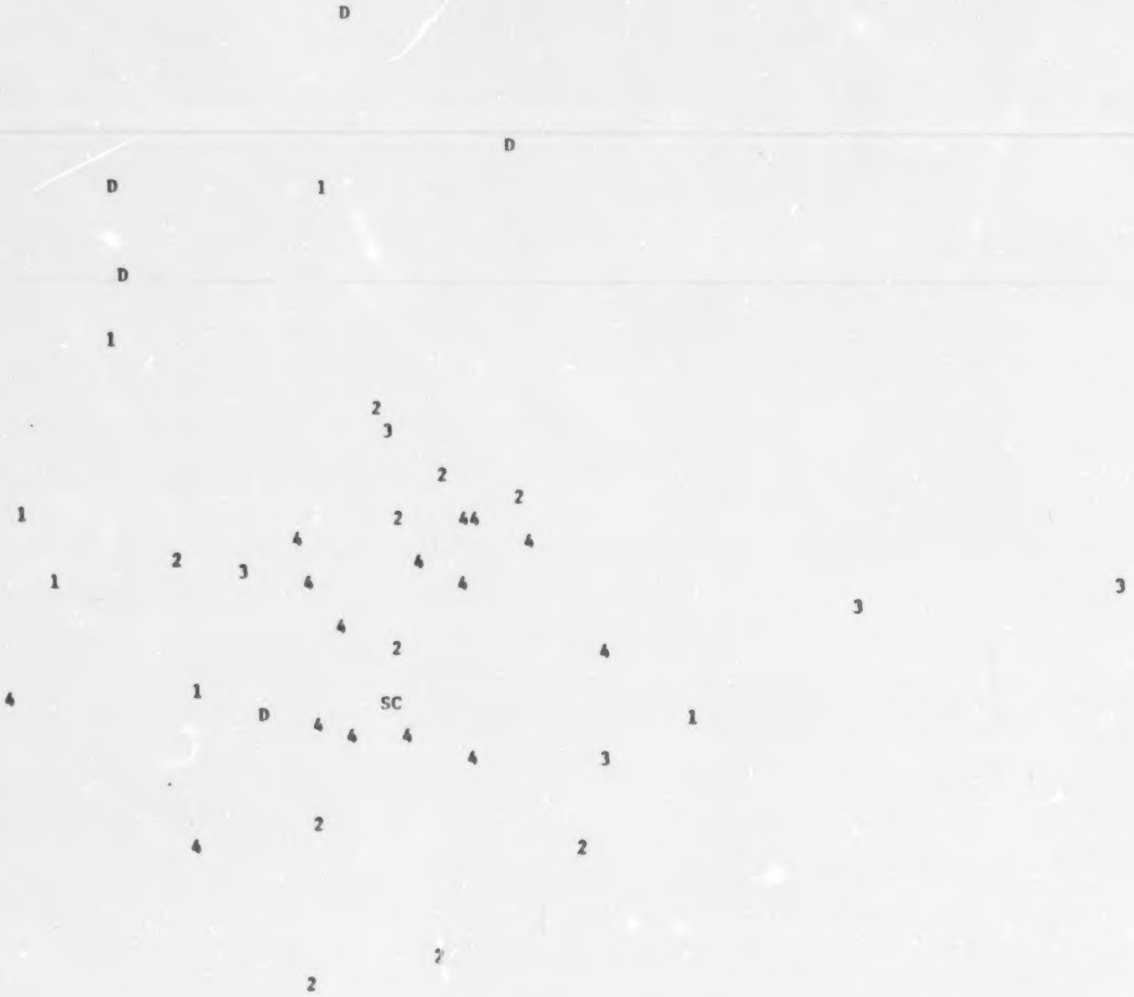


Figure 2. Location of recognition decisions in two dimensions

(Sample 1. N = 43)

not be revoked, and WD (in Figure 3) an agency that withdrew its petition for recognition.

With a few exceptions, the agencies recognized for four years cluster around the center of Figure 2, while those denied or recognized for only one year are at the top or scattered around the periphery of the figure. The agencies in the center of the figure are described in the staff reports by a large number of favorable statements indicating compliance with virtually all of the criteria.

The statements most commonly applied to the agencies at the top of the vertical dimension questioned the impartiality of their decisions, their responsiveness to the interests of all their constituencies and the general public, and their interest in maintaining acceptable standards. Of the six agencies closest to the top of the figure, four were denied recognition and two were recognized for one year. Each of the following statements appeared in the staff reports of at least four of those six.

> Some doubt exists as to whether the agency ensures impartial and objective evaluations and decisions.
>
> One or more constituencies are omitted or underrepresented on the agency's policy or decision-making body.
>
> The agency does not provide for or currently have public representatives on its policy or decision-making body.
>
> The agency does not publish the current accreditation status of institutions or programs.

> The agency does not publish dates for the next review of accredited institutions or programs.
>
> Appeal procedures are unclear.
>
> Policies for review of standards or procedures are not clear; the agency has failed to demonstrate that it seeks input concerning its standards from all affected constituencies.
>
> Agency staffing is inadequate or questionable in terms of personnel qualifications or commitment of time.

The bottom end of the vertical dimension emphasizes the lack of attention to standards characteristic of those at the top of the figure. While many of the favorable statements about the agencies in the center of the figure did not appear for those at the top, the following additional statements about standards were more often assigned to agencies at the bottom of the figure than to those in the middle (and not at all to those at the top).

> An active program to improve accreditation standards or evaluative procedures is carried out.
>
> The agency monitors continuing compliance with standards through regular reports submitted by institutions or programs.
>
> Institutions or programs appraise the accomplishment of stated objectives.

One initially puzzling aspect of the vertical dimension is the predominance at its lower end of five agencies recognized for only two years. None of the statements that characterized those agencies as a group was unfavorable. If agencies at the high end of the dimension are weak and those in the middle strong, those at the low end of the dimension should be particularly strong and would not be expected to have their period of recognition limited to two years. Review of the staff summaries for those agencies showed that all five were strong, well-established agencies that had previously been recognized for four years. However, in every case some deficiency had led the Advisory Committee to recommend limiting the renewed period of recognition while the agency corrected the deficiency. Because the agencies' deficiencies were all different and not related to standards, impartiality, or responsiveness, their location on that dimension was unaffected.

While the vertical dimension orders agencies from top to bottom in terms of increasing strength with respect to general issues of integrity, responsiveness, and concern for standards, the horizontal dimension separates them primarily with respect to their evaluative procedures, integrity, and reputation. Agencies at both extremes on the horizontal dimension were described with a large number of favorable comments that also characterized the agencies clustered in the center of the figure. Comments about agencies toward the right included, in addition, several that reflected favorably on the training and functioning of visiting teams, and several others related to ethical practice and broad acceptance in professional fields. Agencies on the left were deficient in a variety of areas related to their evaluative procedures, including inadequate site visits.

In general, the more effective agencies, as described in DEAE staff reports, should appear toward the right and bottom in Figure 2, with the less effective agencies toward the left and the top. The distribution of the decisions fits that pattern with some exceptions. Of the 12 agencies that were denied recognition, asked to show cause, or recognized for only one year, eight are in an arc running from the top to the left of the figure. The strongest agencies, however--those recognized for four years--cluster in the middle of the space rather than in the lower right quadrant, as would be expected. The small group of agencies with two-year recognition decisions in the lower portion of the figure has been identified as strong agencies which nevertheless had been judged as having deficiencies of some kind. The agency with a four-year decision toward the left side of the figure, and the agencies with denial and show-cause decisions in the center, were anomalies that merit examining.

The agency granted recognition for four years, but which nevertheless appears uncharacteristically to the left of the main group of agencies, was described in the staff report with a number of statements concerning its organizational structure and accrediting procedures. Although favorable, the statements nevertheless tended to be associated with agencies toward the left end of the horizontal dimension. Two unfavorable statements, also associated with the left side of the figure, concerned vagueness in the agency's procedures for handling complaints and appeals. The statements related to evaluation procedures, the dominant aspect of the horizontal dimension, were favorable and similar to those made about the large central group of agencies. Previously recognized for two years, the agency's four-year recognition was recommended by the Advisory Committee, with a request for an interim report on the agency's progress in clarifying its appeal and complaint procedures. In this case, the agency's position to the left was the result of an unusual combination of favorable statements not related to the dominant aspect of the horizontal dimension, plus two unfavorable statements that did not affect the decision.

The two agencies that were judged to be low in their ability to determine educational quality--one denied recognition and the other asked to show cause why its recognition should not be withdrawn--provided an interesting contrast. The agency denied recognition was a case in which the decision was questionable. If the decision was indeed a correct one, then the information on which it was based did not get expressed clearly in the DEAE staff report. The agency asked to show cause, however, was a case in reverse. That decision was amply supported by statements in the staff report; the analysis was not sensitive to them.

The staff report on the agency denied recognition contained

80 separate statements listed in the catalog of 559 statements derived from the earlier reading of staff reports. Of these, 50 were statements also characteristic of the highly regarded agencies clustered in the middle of Figure 2. All but three of the remaining 30 were either favorable statements (e.g., on-site review teams are sent relevant material about the school well in advance of the review) or neutral ones (e.g., the agency does not use a preaccreditation status). Two of the three unfavorable statements dealt with fairly innocuous issues (e.g., some or all of the meetings to review the visiting team's report have been held without a visiting team member present). The third concerned ambiguity or lack of completeness in the agency's standards, a fairly serious deficiency, but one not usually sufficient to justify denial. The agencies appearing in the lower part of the figure with two-year decisions had a greater number of equally serious deficiencies.

The Advisory Committee's recommendation for denial of recognition to the agency, which was less than five years old and petitioning for recognition for the first time, stated that the agency failed to demonstrate compliance with two criteria: that the agency serve "clearly identified needs," and that the agency be "national or regional in its scope of operations." Neither of these failures was noted in the staff report, and because the agency had a large number of qualities similar to those of well-regarded agencies, it appeared in the midst of that group in the multidimensional scaling analysis. The decision to deny recognition was withdrawn less than six months after it was made, and recognition was granted for one year.

The agency that had been asked to show cause why its prior recognition should not be withdrawn was described in the DEAE staff report with 85 statements, 43 of them characteristic of the effective group of agencies clustered in the center of the figure. Of the other 42 statements, six described fairly severe deficiencies, such as possible conflict of interest, and limited acceptance in its professional field. The staff report showed substantial justification for the Show Cause decision. The large number of representative, favorable statements, and the scattered nature of the deficiencies, with only one or two of the unfavorable statements related to the two dimensions of Figure 2, resulted in the location of an agency of questionable merit among the more representative agencies.

The results of a similar analysis with the other random half of the regional and specialized agencies on which decisions were made during the period from 1975 to 1978 are shown in Figure 3. Here five agencies are widely separated from the others, with three or four more somewhat detached from a central group that has been forced closer together than the agencies shown in Figure 2 in order to accommodate the marked differences of the outlying agencies.

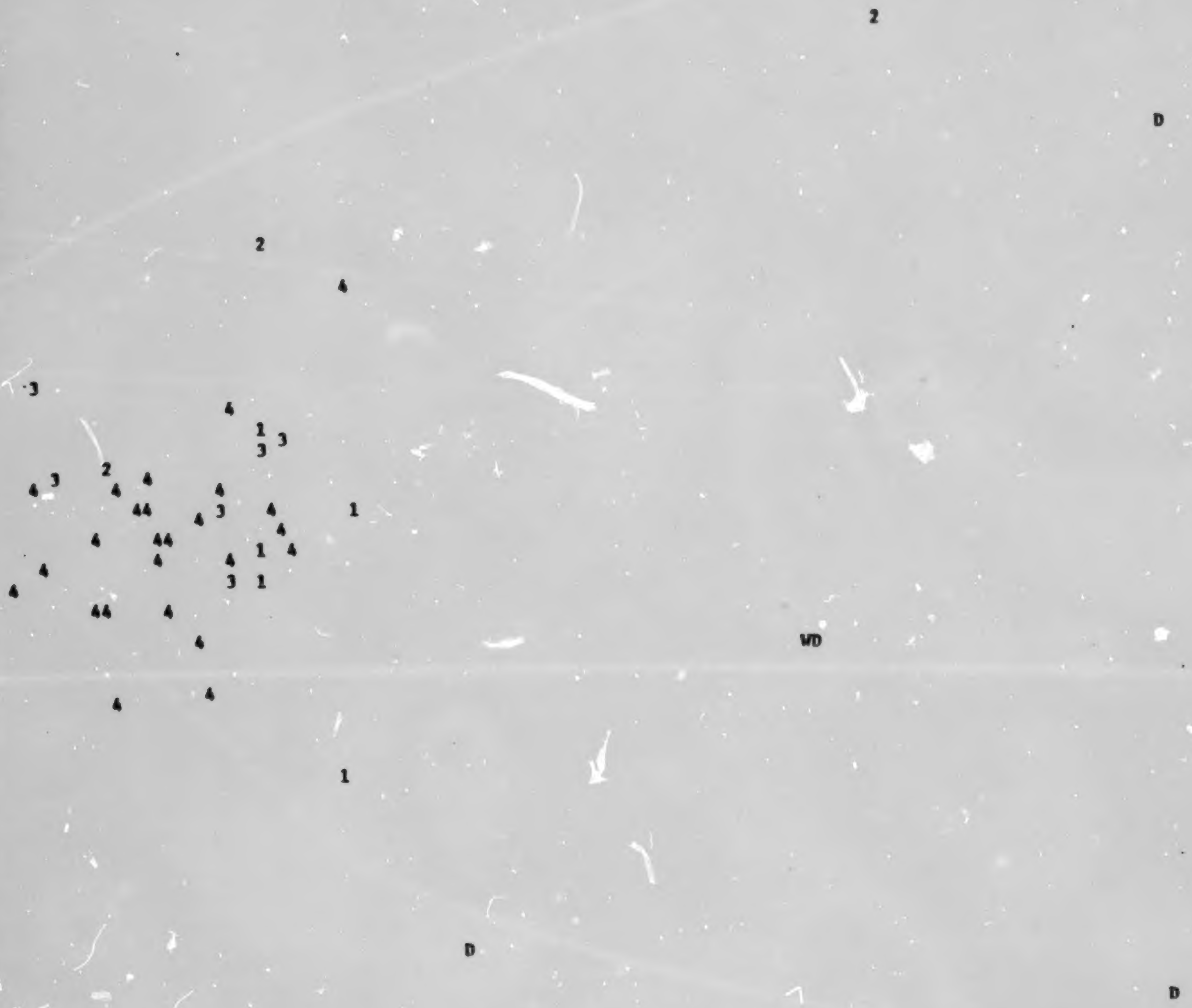


Figure 3. Location of recognition decisions in two dimensions

(Sample 2. N = 43)

With one exception--the agency granted recognition for two years--the outlying agencies were either denied recognition or withdrew the petition for recognition.

The horizontal dimension of Figure 3 is much the same as the vertical dimension of Figure 2. Eighteen statements described common aspects of the two dimensions. Agencies located toward the right side of Figure 3 were described with statements critical of their integrity, their responsiveness to the interests of their constituencies and the general public, and some of their evaluative procedures. Agencies toward the left were judged as giving close attention to evaluative procedures, such as providing training for visiting teams and encouraging their accredited programs to engage in continuing self-evaluation. In addition to its close similarity to the vertical dimension of Figure 2, this dimension also shows some of the characteristics of the horizontal dimension of Figure 2. In particular, some of the attention to evaluative procedures that distinguished between agencies at the right and left sides of Figure 2 is apparent in the distinctions between agencies at the right and left sides of Figure 3 as well. Thus the two fairly distinct dimensions of Figure 2 seem to have been collapsed into one dimension in Figure 3.

The vertical dimension of Figure 3 is difficult to interpret. The agencies lying toward the top and bottom extremes were not consistently differentiated by similar statements. The two agencies in Figure 3 that depart from the pattern of strong agencies at the center and weak agencies around the periphery are the agency recognized for two years in the extreme upper right and the agency recognized for four years above and slightly to the right of the main group. These two would conform more closely to the pattern of the other 41 agencies if the first were denied recognition and the second were recognized for one or two years.

Seven statements applied to the agency in the upper right corner of Figure 3, which was granted recognition for two years, were also applied to other agencies located on the right side of Figure 3. They were related to ethical standards; the impartiality of decisions; the representativeness of policy or decision-making bodies, and the presence or absence of public representatives on these bodies; and the adequacy of self-study procedures and the agency's own evaluation of its standards. These areas involve all three of the types of criteria reflected in the horizontal dimension of Figure 3--integrity, responsiveness, and evaluative procedures.

The DEAE staff recommendation to the Advisory Committee was for recognition for one year. The Advisory Committee's recommendation to the Commissioner was for recognition for two years, with an interim report in one year that would address the deficiencies noted above. In this instance the agency was similar to other agencies denied recognition but was treated less severely. One reason for its more lenient treatment was that of the five agencies farthest to the right in Figure 3, all except this agency were applying for initial recognition, and three of the four had been operating for less than five years. This agency had been operating for more than 20 years and was applying for renewal after an earlier recognition period of three years.

The agency with the four-year recognition decision farthest toward the top in Figure 3 was evaluated under the 1969 criteria. The inclusion of a number of statements in its staff report that were more common to the 1969 than to the 1974 criteria moved it away from the main group of agencies. Its only deficiencies--in the area of self-study procedures--were noted in the Advisory Committee's recommendation. They were not substantial enough, however, to move the agency very far toward the right in Figure 3, or to cause the Advisory Committee to limit its period of recognition.

SUMMARY

Locating agencies in a two-dimensional space in accordance with the differences among them revealed consistent patterns of characteristics associated with the different recognition decisions. One dimension is related to the agencies' impartiality, responsiveness to various constituencies as well as to the general public, and attention to the development and application of standards. Agencies strong in one of these areas tended to be strong in the others. The other dimension separates agencies according to the strength of their evaluative procedures and the degree of acceptance accorded them in their particular professional field.

An agency's location in this two-dimensional space carries a fair amount of the information on which the recognition decisions were based. As an agency's distance from the central group increases, either upward or to the right in Figure 2, the agency is increasingly likely to show deficiencies associated with the two dimensions just described. That the agencies actually denied recognition or recognized for only one year tended to be the ones farthest removed from the central group indicates some degree of reliability and validity in the decision process. It is reliable to the extent that the agencies recognized for four years are located in a common, limited region of the space while the agencies denied or given limited recognition are consistently separated from that region. If the process were not reliable, the various types of decisions would be intermingled throughout the space. The validity of the decision process is indicated in the nature of the agencies at the extremes of the two dimensions. Substantive deficiencies with respect to a number of the criteria are associated with the regions where the agencies denied or given limited recognition are found. If the decision process were not valid--that is, did not permit inferences that the agencies denied recognition were less able to provide judgments of educational quality than were the agencies recognized for three or four years--the two dimensions would not reflect the presence or absence of substantive deficiencies.

Clearly, the decision process has some degree of reliability and validity. Equally clearly, the analysis just described does not provide all the information necessary for more complete conclusions about the validity and reliability of the recognition process. Questions can be raised about the adequacy of both the data and the analysis.

The data were limited to the content of the DEAE staff reports, which may not have reflected an agency's characteristics entirely accurately. If they had been completely accurate, the analysis used would still have ignored characteristics that were rarely reported, but which nevertheless may have been highly important in any particular decision. A partial check on the accuracy of the DEAE staff reports was provided through an independent ETS staff analysis of a sample of the original petitions submitted by agencies. This procedure and analysis will be described in Chapter VII.

The loss of information about rare but important characteristics of agencies results in an inevitable but not serious reduction in the accuracy with which validity is assessed. Validity applies to the justification for inferences drawn from the process in general; it is not applied separately to individual cases. The occasional decisions that occur in unusual circumstances, and as a result depart from the general pattern, either properly or improperly, do not affect the merit of the general run of inferences drawn from the decision process. The pattern of the decisions is the proper basis for judgments of both reliability and validity.

Some limited evidence that the recognition process is both reliable and valid was found in the ways consistent discriminations were made among agencies in terms of the extent to which they satisfied the general body of recognition criteria. More extensive observations related to reliability and validity will be reported in the following chapters.

VI. IMPORTANCE OF AGENCY CHARACTERISTICS

If recognition decisions are to differentiate agencies that provide sound judgments of educational quality from those that do not, the observed differences among agencies must reflect their different levels of performance. Other kinds of distinctions, however useful for some other purpose--as, for example, with respect to the provision of other professional services--are not pertinent to the validity of recognition decisions. A major task of the present study, therefore, was to determine what persons who view accrediting from different perspectives regard as the most important attributes of accrediting agencies in their role as evaluators of educational quality. One perspective was provided by the executive directors or chief administrative officers of accrediting and state approval agencies. The directors of every agency that had ever inquired about recognition by the U.S. Office of Education, whether or not a formal petition was eventually submitted and whether or not the agency was subsequently recognized, were invited to contribute their views to the study. Others were added from the list of agencies recognized by the Council on Postsecondary Accreditation (COPA) and from the membership of the Council of Specialized Accrediting Agencies (CSAA). Correspondence with the agencies indicated that some were no longer functioning as accrediting agencies and that others, after having made initial inquiries to DEAE, had never taken on an accrediting function. These agencies were excluded, leaving a final list of 129 accrediting and state approval agencies. Some of the characteristics of those agencies are shown in Table 5.

TABLE 5

Number of Accrediting and State Approval Agencies of Different Types

	Recognized	Not Recognized	Total
Regional			
Nonmedical	11	0	11
Medical	0	0	0
State			
Nonmedical (Vocational)	13	5	18
Medical (Nursing)	7	3	10
Specialized			
Nonmedical	23	28	51
Medical	28	11	39
Total	82	47	129

Obtaining the judgments of heads of accrediting agencies had three purposes. One was simply to identify the degree of importance they attached to attributes of such agencies in the evaluation of educational quality. The second was to determine whether their views differed with the type of agency they directed. The third was to provide an authoritative set of judgments against which the critical qualities in the recognition decisions could be evaluated. If attributes considered important by the agency directors were neglected in the recognition decisions while others they thought less important played critical roles, one aspect of the validity of the decisions would be damaged.

The 44 criteria themselves seemed too diverse in their specificity--sometimes very broad and sometimes quite narrow--to permit interpretable judgments of importance. They had also been thoroughly discussed during their formulation and were likely to elicit automatic, well-rehearsed judgments. A selected set of the descriptive statements derived for each criterion from the DEAE staff reports was therefore used, since judgments of their importance were likely to be directed to the content of the statement rather than to the complex web of associations each familiar criterion would evoke.

Because soliciting judgments on each of the 559 statements was impractical, some procedure was needed for selecting a comparatively small number of statements to be judged. A series of factor analyses of the statements that appeared in the first group of 52 staff reports had identified seven factors--that is, seven moderately independent groups of mutually related statements. The 52 staff reports were a stratified random sample of the reports, so those factors could be expected to include the most discriminating statements in the full set of reports. Accordingly, 80 statements were selected to represent those seven preliminary factors, with a secondary stipulation that at least one statement for each criterion be included. Only Criterion c3, that the agency have at least two years of experience, was not represented. The seven early factors were, as expected, similar in content to the factors described in Chapter IV, but organized somewhat differently. The similarity was great enough that each of the nine factors based on the complete data was represented in the 80 statements.

AGENCY DIRECTORS' JUDGMENTS OF IMPORTANCE

The 80 statements were sent in the fall of 1978 to the chief administrative officers of the 129 identified accrediting and state approval agencies. They were asked to judge the importance of each characteristic described by the statements in determining the quality of education offered by an institution or program. The judgments applied to a somewhat specific function--the determination of educational quality--of a specific agency, with an option for the agency head to report that any particular statement was not pertinent to his or her agency's operation. The determination of educational quality was not further defined. Since it was also left undefined in the legislation providing for the Commissioner's list of recognized agencies, a more specific definition might have limited the scope of the judgments more narrowly than intended by Congress.

The judgments of importance were recorded on a seven-point scale from no importance to high importance. The results are presented in Appendix B, with the statements organized according to the original seven factors, as they were presented in the questionnaire. The statements in Table 6 are those the agency directors most frequently judged high in importance, with ratings of 6 or 7 given by 90 percent or more of the 92 agency heads who responded in time to have their judgments counted. Those 92 represented 71 percent of the identified accrediting and state approval agencies. Representation of different types of agencies ranged from 62 to 92 percent, with the unrecognized agencies having the poorest representation.

The most important qualities of accrediting agencies, in the views of their directors, were good evaluative procedures (Statements 240, 272, 261, and 128), rigorous but fair application of standards (Statements 55, 593, 591, and 590) and due process (Statements 470 and 460). The comparatively less important

TABLE 6

Statements Most Frequently Judged of High Importance by Agency Directors (N=92)

			Percentages of Ratings		
Criterion		Statement	1 to 5	6	7
a3iiiA	240	A self-study and on-site review are required that provide for the qualitative assessment of an institutions's or program's strengths and weaknesses.	4	7	89
b2iiA	55	The agency publishes the standards by which institutions or programs are evaluated.	4	10	85
b3ii	272	Visiting teams engage in discussions with faculty, administrators, and students.	4	14	82
b3iii	261	Each institution or program is given a copy of the visiting team's report, which indicates strengths, weaknesses, and recommendations for improvement.	4	17	79
b3vii	470	The agency reports the specific reasons for adverse decisions to the chief executive officer of the institution or program and offers an opportunity to appeal.	4	22	74
b3vi	460	Accreditation is withdrawn only after due process, for cause, and with due notice.	6	19	76
b8	593	Written procedures clearly assure that only qualified institutions or programs are accredited or approved.	6	22	72
b8	591	The agency's decisions reflect fair and consistent application of its standards.	7	17	77

TABLE 6
(cont'd)

Statements Most Frequently Judged
of High Importance by Agency Directors
(N=92)

Criterion		Statement	Percentages of Ratings 1 to 5	6	7
a3iiiB	128	Written instructions, guidance, and consultation are provided for the self-study and on-site visit.	7	18	75
b9	54	Institutions or programs are regularly reviewed at reasonable intervals.	7	21	72
b8	590	The agency's published procedures are fairly applied; its actions are consistent with its procedures.	8	12	80
b10	651	Institutions or programs are clearly informed of the nature and scope of their accreditation status.	8	16	76
b9	598	When circumstances warrant it, institutions or programs are re-evaluated at intervals shorter than the normal cycle.	9	25	66
a3i	40	Procedures for granting, denying, withdrawing, or reinstating accredited status are clearly described.	10	18	72
b1i	270	Faculty members are given opportunities to make their views known to the agency.	10	31	59

statements were related to the agency's organizational scope and structure (e.g., the scope of the agency's activities is neither too narrow nor too broad; fees are reasonable) and the agency's responsiveness to its constituencies (e.g., all interested groups are represented on the governing board; accreditation status and the dates of next review are published). These differences were not great, however, since even the statements judged comparatively low were still important. All but 11 of the 80 statements were judged higher than "Of Moderate Importance" by at least half of the directors. The comparative nature of the differences in importance must therefore be stressed. Nevertheless, the qualities most often judged high in importance were those associated with evaluative procedures, fairness, and due process.

Importance of General Qualities

The seven groups of related statements into which the 80 were organized were each given a label, were described in one or two phrases, and were presented to the directors to be ranked in order of importance. In these comparative rankings, the broader issues to which the statements refer were judged rather than the particular characteristics that contribute to the evaluation of an agency. The variation in importance of different specific characteristics associated with the same more general quality was overridden in these judgments. For example, as is shown in Table 7, the agency's attention to its standards was most often judged the most important quality of the seven. Yet some detailed aspects of that attention to standards--that they are validated against the performance of graduates of accredited programs, and that information on standards is exchanged with other agencies--were individually judged quite low in importance. Other statements related to standards--that their validity and reliability are evaluated, and that continuing compliance is monitored through regular reports--were judged about in the middle of the 80 statements, which gave them somewhat more than "moderate importance." Still others--that standards are published, and that they are fairly applied--were quite high.

The agency directors were quite clear in identifying the two most important of the general qualities of accrediting agency performance listed in Table 7. Attention to standards was judged first in importance by 40 percent of the directors and second by over 30 percent more. The quality of the evaluative procedures was a clear choice for second place. The other five were far behind.

Again, the qualities least often judged highest in importance were not unimportant, as was indicated by the judgments of high importance for some of their contributing statements. Due Process, for example, was placed least often in one of the top two broad

TABLE 7

Comparative Importance of General Qualities

Percent Ranking First (N=92)	Percent Ranking First or Second (N=92)	General Qualities	Average Index of Importance[a]
40	73	Standards: The clarity and appropriateness of the agency's standards and the care with which it develops and maintains them.	75.6
27	56	Evaluative Procedures: The comprehensiveness and care with which institutions or programs are evaluated.	81.4
17	23	Agency Integrity: The degree of trust engendered by the agency through its reliability, autonomy, and concern for ethical practice.	73.3
7	20	Accrediting Procedures: The specificity of the agency's procedures and their pertinence to its purposes.	78.5
8	14	Scope and Organization: The clarity of the agency's purposes, the effectiveness of its organizational structure, and the adequacy of its resources.	71.5
1	8	Responsiveness: The sensitivity of the agency to the needs and desires of the groups it affects, and its readiness to respond to them.	67.8
1	7	Due Process: The care with which procedures are structured and codified to avoid unfair or capricious actions.	84.7

[a] See Footnote 2, page 103.

qualities. Yet two of its components--withdrawing accreditation only for cause and after due process, and reporting specific reasons for adverse decisions--were given the highest rating of importance by 76 and 74 percent of the directors, respectively. In fact, if the ratings of the individual statements in each group are averaged, Due Process emerges as highest in importance, with Evaluation Procedures close behind. Standards is in fourth place, behind Accrediting Procedures, despite its clear preeminence in the judgments applied directly to the general qualities. These average judgments are shown in the last column of Table 7.[2]

The discrepancies between the importance given Due Process and Standards when they were judged as general qualities and when their standing was based on the average importance of their component statements merit examination. Due process, in particular, is puzzling in its shift from last place in judged importance as a general quality to first place in the average importance of its related statements. The most likely reasons are either a failure of the statements to represent the general quality or a failure of the definition of the general quality to convey the meaning of its related statements.

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[2] The judged importance of the statements averaged to estimate the importance of the criteria was defined as the sum of the percentages of '6' and '7' judgments less the sum of the percentages of '1' and '2' judgments on the seven-point scale of importance. For example, Statement 572 was given judgments of '7', '6', '2', and '1' by 45, 24, 3, and 1 percent of the directors. Adding 45 and 24, and subtracting 3 and 1 give its index of importance as 65. This index was used rather than the median or mean values to translate the distributions of ratings into a single number to represent importance. Medians would not give sufficient weight to the small but important number of low judgments in the J-shaped distributions of importance, and means would give them too much weight. The shape of the distributions made the index described more interpretable than either of the more common measures of central tendency. The values of the index ranged from 16 to 96, with a median of 70.5 and a mean of 68.7.

The statements associated with Due Process are shown in Table 8. Eight of the ten were judged quite high in importance. The definition of Due Process as a general quality treats it as a set of formal procedures to prevent unfair or capricious actions. The existence of appeal procedures, a requirement that withdrawal of accreditation be only for cause, and other procedural protections may not be adequately conveyed by a phrase limited to the avoidance of unfair or capricious actions. To that extent, Due Process is a more important quality of accrediting agencies than is indicated by the judgments reported in Table 7.

Standards--the care and attention they are given--shows a discrepancy in the other direction. While it was the most important general quality in the collective views of the agency directors, it fell in the middle in terms of the average importance of its related statements, which are listed in Table 9. The first six statements in Table 9 were all above the median value in judged importance. The other five pulled the average down for these statements, but Due Process, Evaluation Procedures,

TABLE 8

Importance of Statements Related to Due Process

	Statement	Index of Importance[a]
470.	The agency reports the specific reasons for adverse decisions to the chief executive officer of the institution or program and offers an opportunity to appeal.	95
460.	Accreditation is withdrawn only after due process, for cause, and with due notice.	94
590.	The agency's published procedures are fairly applied; its actions are consistent with its procedures.	92
441.	The chief executive officer of the evaluated institution or program is given an opportunity to respond to the visiting team report.	87
510.	Notification of specific reasons for an adverse action on an appeal is required.	83
471.	The agency has published rules of procedure regarding appeals.	78
500.	Adverse decisions are followed by a hearing at which representatives of the affected institution or program may appear.	75
490.	An institution's or program's accreditation status cannot be changed by the agency while an appeal is pending.	74
484.	Appeal procedures include safeguards against bias; e.g., no one involved in the original decision may serve on the appeal committee.	59
450.	At least one member of the visiting team is required to be present at the evaluation of the visiting team report.	36

[a] See Footnote 2, page 103.

Accrediting Procedures, and Integrity all come out higher than Standards if only their six statements judged most important are averaged. The most reasonable conclusion seems to be that the general quality related to the attention an agency gives to its standards is not adequately accounted for by the specific observations related to standards that enter the recognition process.

TABLE 9

Importance of Statements Related to Standards

	Statement	Index of Importance[a]
55.	The agency publishes the standards by which institutions or programs are evaluated.	95
411.	The agency's standards are clear and detailed enough to assure fair and reliable treatment to institutions or programs.	87
380.	Standards are not revised until after interested groups have had an opportunity to react to the proposed revisions.	81
552.	The agency regularly reviews its standards, policies, and procedures by inviting suggestions from various interested groups.	76
556.	The agency monitors educational standards to keep them consistent with occupational trends.	72
382.	An active program to improve accreditation standards or evaluative procedures (e.g., studies, conferences, workshops) is carried out.	71
332.	Institutions or programs are evaluated with respect to their own purposes rather than in comparison with others.	66

TABLE 9
(cont'd)

Importance of Statements Related to Standards

	Statement	Index of Importance[a]
550.	The agency evaluates the validity and reliability of its own educational standards.	66
572.	The agency monitors continuing compliance with standards through regular reports submitted by institutions or programs.	64
555.	Standards are validated against the performance of graduates of accredited institutions, such as in licensure examinations.	29
642.	Information regarding standards and guidelines for conduct of site visits is exchanged with other accrediting agencies.	18

[a] See Footnote 2, page 103.

These two sets of discrepancies--for Due Process and Standards--between the average importance of groups of related statements and the importance of the general quality to which they contribute--suggests a need for clearer conceptualization of some of the criteria. If important details are missing from the observations of agencies concerned with their attention to standards, they should be identified. At the least, both Due Process and Standards need detailed examination to clarify the specific agency attributes and performances that should be observed in the evaluation of those two general qualities.

Importance of the Criteria

The statements judged by the agency directors identified specific agency characteristics related to the criteria. The seven general qualities that the directors judged were broader in scope than the criteria, and the two sets of judgments were in some respects not consistent. The judged importance of the criteria, since they are explicit statements of the qualities on which recognition rests, may clarify some of the inconsistencies.

Thirty of the 44 criteria were restated completely by one or a combination of statements. For example, Criterion b2iiA states, "The agency or association publishes or otherwise makes publicly available the standards by which institutions or programs are evaluated." Statement 55 reads, "The agency publishes the standards by which institutions or programs are evaluated." That single statement indicates compliance with that criterion, even though amplifying statements may be added. The judged importance of Statement 55 can therefore be applied to Criterion b2iiA as well. When the criterion was more complex, the ratings of several statements were averaged to determine its importance. The levels of importance of the 30 criteria for which judgments of direct restatements were available appear in Table 10.

TABLE 10

Importance of the Criteria

	Criterion (abbreviated)	Index of Importance[a]
b3ii	Visiting teams meet with faculty, administrators, and students.	96
b3iii	A written report of the visit is provided.	96
b2iiA	Standards are published.	95
b3vii	Agencies may appeal, and reasons are given for adverse decisions.	95
b3vi	Accreditation is withdrawn only for cause and after due process.	94
b9	Reevaluation occurs at reasonable intervals.	94
a3iiiB	Guidance is provided for the self-study and site visit.	93
b8	Standards are fairly applied; decisions are impartial.	91.2
b3iv	The chief executive officer (CEO) may comment on and supplement the visiting team's report.	87
a3i	Accrediting procedures are clearly defined.	83.5
d1	No function interferes with independence of judgment.	82
b2iii	Reactions are solicited to proposed revisions of standards.	81
d2	Procedures exist to guard against conflict of interest.	78

TABLE 10
(Cont'd)

Importance of the Criteria

	Criterion (abbreviated)	Index of Importance[a]
b3viii	Appeal procedures are provided.	77.8
b1ii	Purposes are clearly defined.	75
b2iv	Written procedures provide for equitable review of complaints.	73
a2v	Visiting teams include one member not part of the agency.	70
b2iiB	Decision procedures are published.	70
c1	The agency's policies and procedures are widely accepted.	70
a2ii	Financial resources are adequate.	67
b5	A program exists for the evaluation of the agency's standards.	67
b3i	The initial evaluation is at the CEO's request.	66
b7	Experimentation and innovation are encouraged.	64
b6	The agency requires a program for the evaluation of outputs.	73
b2iiE	Ownership and control are published.	62
a2iii	Fees are reasonable.	60
b2iiG	Current accreditation statuses and dates of next review are published.	59
c4	All directly affected groups are represented on the governing board.	46

TABLE 10
(Cont'd)

Importance of the Criteria

	Criterion (abbreviated)	Index of Importance[a]
a3ii	Preaccreditation is related to accreditation.	42
b3v	A visiting team member is present at the evaluation of the report.	36

[a] See Footnote 2, page 103.

The values in Table 10 are directly interpretable. Every criterion with a value greater than 50 was judged more important than "Of Moderate Importance" by at least half the directors after the number of those judgments was reduced by the number of judgments lower than "Of Low Importance." Values greater than 50 therefore indicate a consensus judgment of importance higher than "moderate." Three criteria fell below that value; the others ranged upward from 59.

The five criteria most often judged high in importance are related to Evaluation Procedures, Standards, and Due Process. Judged among the most important were three criteria directly related to Due Process--the right to appeal, the requirement of due process before accreditation may be withdrawn, and the chief executive officer's right to respond to the visiting team's report.

The placement of Due Process last in importance among the general qualities seems to be an error possibly due to a definition of the general quality that lacked clarity or scope, or both.

Criteria associated with Standards are widely scattered among the criteria of Table 10. One limited criterion, b2iiA, requiring that standards be published, was among the top few in judged importance. Criterion b2iii, requiring that interested groups be given an opportunity to comment before standards are revised, fell slightly above the middle. Criterion b5--for a continuing program of evaluation of the agency's standards--was judged somewhat below the middle of the 30 criteria listed in Table 10.

That the greatest number of agency directors unequivocally judged standards to be the most important general quality, despite the mixed ratings given both the related criteria and the descriptive statements associated with them, suggests that some important aspects of standards may be neglected in the recognition process. An alternative possibility is that although the concerns for standards may have been given appropriate attention in the recognition process, the related statements were associated not with Standards, but with Due Process and Fairness. Fairness appeared as a general quality in the later, more complete factor analyses, but in the earlier analyses it had been scattered among Integrity, Due Process, and Standards. These uncertainties over the meanings of some of the most important qualities of agencies, as indicated by the judgments of their importance that conflicted when applied at different levels of generality, indicate a need for greater clarity in the general agency qualities which the criteria in some sense define. If the kind of attention an agency gives its standards is judged to be one of the most important aspects of the evaluation of educational quality, the criteria related to standards should show an equivalent level of importance.

Consistency of Directors' Judgments Across Agency Types

The diversity of accrediting agencies in size, experience, range and type of programs evaluated, type of organization, and other qualities suggests that directors of different types of agencies may differ consistently in what they consider important. For example, directors of agencies that accredit medical or allied health programs can be expected more often than directors of nonmedical agencies to be concerned with clinical education, with training for a clearly defined occupational field, and with licensure and certification. The differences that appeared in the judgments of directors of medical and nonmedical agencies are shown in Table 11.

The judgments of importance shown in Table 11 are in terms of cumulative percentages. The figures indicate the percentage in each group of directors who judged a statement in a given category of importance plus the percentages in all lower categories. This

TABLE 11

Judgments of Importance by Directors of Medical and Nonmedical Agencies

	Statement	Agency Type	N	Ratings of Importance (cumulative percentages)						
				1	2	3	4	5	6	7
556.	Standards are kept consistent with occupational trends.	Med	40					12	32	100
		Nonmed	44	2	2	11	14	34	63	100
6.	Most programs in its field seek the agency's accreditation.	Med	38		3	3	8	21	37	100
		Nonmed	46	9	13	30	46	59	74	100
661.	The agency is broadly recognized by educational institutions, licensing agencies and professional fields.	Med	40		2	5	8	15	25	100
		Nonmed	47	2	2	8	21	36	62	100
2.	The agency's activities are neither too broad nor too limited for the need it serves.	Med	39			3	5	13	38	100
		Nonmed	49	4	8	10	33	49	71	100
190.	Visiting teams include at least one person not connected with the agency.	Med	37	5	8	14	24	38	60	100
		Nonmed	47	4	4	4	6	6	30	100
572.	Continuing compliance with standards is monitored through regular reports.	Med	40		2	2	5	20	39	100
		Nonmed	46	2	6	13	17	37	67	100
54.	Institutions or programs are regularly reviewed at reasonable intervals.	Med	40						12	100
		Nonmed	49				4	10	39	100
582.	Institutions or programs are free to use a variety of educational methods.	Med	40					10	28	100
		Nonmed	46				6	22	54	100
700.	All significant, interested groups are represented on the policy-making body.	Med	37			11	16	36	46	100
		Nonmed	47	6	11	21	34	53	72	100

form of presentation permits quick comparisons between the overall judgments of two groups by examining the largest difference within any category. When two groups, each of about 40 persons, are compared, any difference in the cumulative distributions smaller than 25 percentage points is likely to be due to random fluctuations unless independent supporting evidence suggests otherwise.[3]

Directors of medically oriented accrediting agencies gave more importance than did others to the relationship between accrediting standards and occupational trends (Statement 556); to the agency's ability to attract most programs in the pertinent field (Statement 6); to its recognition by educational, licensing, and professional bodies (Statement 661); and to keeping its activities within an appropriate scope (Statement 2). They gave less importance than other directors to the presence on visiting teams of at least one person not connected with the agency (Statement 190). These views seem appropriate for directors of agencies closely tied to occupations that have well established licensing or certification procedures and training programs with highly structured curricula. The other statements in Table 11 show differences large enough to be suggestive, but their content is not consistent enough to merit futher attention.

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[3] The Kolmogorov-Smirnov test for the significance of differences between cumulative percentage distributions, based on two samples of 40 cases each, shows differences of 27 and 30 percentage points to be required for statistical significance at the .10 and .05 levels (Walker & Lev, 1953, pp. 426-428).

Except for the nine statements in Table 11, the directors of medical and nonmedical agencies were quite similar in their judgments. Issues in the areas of evaluation procedures, due process, and fair practice were all viewed similarly by the two groups of directors.

Similar comparisons were made between directors of other types of agencies: recognized and unrecognized; those with less than five years of experience and those with more than 20; those concerned predominantly with pre-baccalaureate or nondegree programs and those that accredit bachelor's and graduate degree programs; and private and state approval agencies. While a few isolated statements showed sizeable differences, they were too few and too scattered in meaning for significance. These comparisons demonstrated that, regardless of the type of agency involved, accrediting agency directors, with few exceptions, agree about the agency characteristics that are most important in judging the quality of education offered by programs or institutions.

COMPARATIVE JUDGMENTS FROM VARIED PERSPECTIVES

Accrediting and state approval agencies serve a variety of constituencies. The validity of an evaluation process granting or refusing an agency recognition must reflect the judgments of its constituencies. In addition to the directors of the agencies, other important and knowledgeable groups are the administrators and faculty members of the institutions and programs evaluated by the agencies; state and federal officials, staff members, and legislators concerned with accrediting and state approval; and miscellaneous others involved with accrediting in a variety of ways. The judgments of persons in all these groups were considered necessary in determining whether the recognition process takes account of the most important qualities of accrediting agencies.

Because the required judgments were long and demanding, an honorarium was considered necessary. As a compromise between a larger sample and cost considerations, the judgments of about 50 persons in each of five groups was thought to be an appropriate number. That number of judgments, if carefully made by a large enough proportion of the people contacted, was expected to be more informative than a greater number of responses from a small proportion of an initially large group. An 80 percent response rate was desired, and as Table 12 shows, was almost reached.

TABLE 12

Composition of Expert Groups

Category	Number Solicited	Number Responding	Response Percentage
Institution and program administrators	62	51	82.3
Faculty members	50	38	76.0
State officials	72	58	80.6
Federal officials	29	17	58.6
Others	63	51	81.0
Unclassified		2	
Total	276	217	78.6

Because federal employees could not be paid honoraria from a government-funded contract, they were not offered that inducement. Their 59 percent response rate compared with an 80 percent rate for the other four groups suggests the effect of an honorarium.

The persons asked to participate as informed judges about the accrediting process were identified through several steps. Nine persons connected in various ways with accrediting and state approval--the President of the Council on Postsecondary Education, the Chairman of the Council of Specialized Accrediting Agencies, the directors of a regional and a specialized agency, and others who had been active in or were scholars of accrediting--were asked to list persons knowledgeable about accrediting in each of the five categories listed in Table 12. Those who appeared on several lists were then sent the names of the persons already listed and were asked for additional nominations. Gaps, such as an underrepresentation of faculty members and administrators from proprietary institutions, were filled through specific requests for nominations from appropriate agency directors. The staff of the Postsecondary Education Department of the Education Commission of the States provided most of the names of the state officials and some names of federal officials. Only 29 federal officials were identified, however, who were not connected with DEAE. The list of administrators was larger than could be accommodated, so deletions were made randomly from overrepresented types of institutions and administrative positions.

The final group of 276 informed persons was not representative of any definable population. It was a heterogeneous group that included persons expected to have at least five differing but informed views of the accrediting and state approval processes.

Since these judges were not as familiar as the directors with the operation of accrediting agencies, and therefore could not make their judgments from the context of a particular agency, they were asked to rank a number of statements rather than make absolute judgments about each one. They were also given brief descriptions of different types of agencies to which their judgments were to apply. This permitted judgments to be made within a reasonably explicit context and to test whether the judged importance of a particular characteristic varied according to the type of agency to which it was applied.

The questionnaire consisted of eight pages, each with a one- or two-sentence description of a different type of agency, plus 15 statements characteristic of that agency. The judges were asked to identify each agency's five most important and five least important characteristics, then to pick the two most important from the five already identified as high in importance and the two least important from those identified as low in importance. Five statements remained in the middle. These ranks were converted to scores of 5, 4, 3, 2, and 1 from the most to least important categories respectively.

A total of 54 statements were organized into groups of 15 that were descriptive of each of the eight hypothetical agencies. Thirty-three of the 54 statements were repeated for three different agencies, which permitted the effect of the type of agency on the ranked importance of the statement to be determined. The mean ranks of the 54 statements are shown in Appendix C.

The statements did not differ appreciably in comparative rank within different agency contexts. Statement 240, for example, requiring a self-study and on-site review, received mean ranks within the 1-to-5 scale of 4.2, 4.2, and 4.0 for, respectively, an agency in an allied health field concerned primarily with bachelor's degree programs, a small state approval agency for degree-granting and hospital-based nursing programs, and a state approval agency for vocational programs. The evaluation of institutions in terms of their own objectives (Statement 332) was given mean ranks of 2.9, 3.0, and 2.7 for the state vocational agency mentioned above, a regional accrediting agency, and a large agency that accredited graduate medical programs. Among the 33 statements ranked in three separate contexts, only one statement showed a spread as large as four-tenths of a point: 2.1, 1.7, and 1.7. Judgments of importance clearly did not vary widely with differences in the type of agency to which the statements were applied. Carrying out an active program for the improvement of the agency's evaluative procedures, for example, was ranked near the middle in importance whatever type of agency was being considered.

The collective judgments of all five groups of informed persons were very similar to those of the agency directors. The rank order correlation between the two sets of ranks for the 38 statements that were common to both questionnaires was .88. A few statements were judged differently by the two groups, and the subgroups of informed judges differed among themselves in several ways, but the overall similarity in viewpoints was remarkably high.

The first six statements in Table 13 were ranked higher in importance by the agency directors than by the other judges. The first, Statement 661, showed by far the greatest difference in ranking between the two groups. Having the agency's authority broadly recognized by appropriate institutions and professional groups was ranked fifth among 38 statements by the agency directors, but well down at 27th by the other judges. Further, that attribute had been judged more important by directors of medical than of nonmedical agencies. The agency directors also were more concerned with evaluative standards and procedures than were the faculty members, administrators, state and federal officials, and others. The group of outside judges, however, gave comparatively more importance than the agency directors to due process, appeal procedures, and the adequacy of the agency's staff, as is indicated by the ranks of the last six statements in Table 13. As noted earlier, however, the two groups were quite similar in their overall judgments.

TABLE 13

--Differences in Ranked Importance

	Statement	Ranked Importance[a]	
		Directors	Other Judges
661.	The agency's authority is broadly recognized by educational institutions, appropriate licensing agencies, and professional fields.	5	27
591.	The agency's decisions reflect fair and consistent application of its standards.	1	9
552.	The agency regularly reviews its standards, policies, and procedures by inviting suggestions from various interested groups.	11	20
21.	The agency's purposes are clearly stated and made publicly available.	14	22
382.	An active program to improve evaluative procedures is carried out.	15	25
332.	Institutions or programs are evaluated with respect to their own purposes rather than in comparison with others.	20	29
470.	The agency reports the specific reasons for adverse decisions to the chief executive officer of the institution or program and offers an opportunity to appeal.	12	4
460.	Accreditation or approval is withdrawn only after due process, for cause, and with due notice.	13	5
50.	The staff is able to carry out the agency's activities with care and without undue delay.	22	11

TABLE 13
(cont'd)

Differences in Ranked Importance

Statement	Ranked Importance[a] Directors	Ranked Importance[a] Other Judges
441. The chief executive officer of the evaluated institution or program is given an opportunity to respond to the visiting team report.	21	13
380. Standards are not revised until after interested groups have had an opportunity to react to the proposed revisions.	26	15
490. An institution's or program's accreditation status cannot be changed while an appeal is pending.	34	23

[a] Figures indicate the ranked importance in each group, a 1 indicating that that statement was ranked highest in importance by that group, and a 38 indicating that that statement was ranked lowest.

The judgments of four of the five groups that made up the informed judges also were compared. Federal officials were not compared with the other groups because of their low numbers. Again, differences of 25 percentage points or more in the cumulative distributions are large enough to merit attention. Differences of that magnitude in several related statements constitute reasonably strong evidence of a notable difference in perspective.

Two such groups of related statements are shown in Table 14, where the categories of Low, Middle, and High show the percentages who ranked each statement among the bottom five, the middle five, or the top five in importance. When the top two and bottom two rankings were added, a five-point scale was produced, and when the same person ranked a statement in three different contexts, a scale with values of from 3 to 15 was produced. All the statements in Table 14 showed differences between at least two of the four groups of at least 25 percentage points somewhere on that 3-to-15 scale. Collapsing the 13-point scale to the three categories of Figure 14 reduced the sizes of the differences between groups.

The first eight statements in Table 14 deal with aspects of agency evaluative procedures--the first five with their implementation, and the next three with procedures for protecting the interests of the evaluated program or institution. The statements within these two groups elicited similar patterns of response. The first group of five statements tended to be ranked high most often by Others and Administrators. The former were critics of accrediting, scholars, informed persons, staff members of professional associations, and other knowledgeable persons not associated with accrediting agencies, colleges, universities, or governmental agencies. The latter were administrators of colleges, universities, proprietary schools, and training programs. These five statements were ranked high least often by state officials--commissioners of higher education, staff members of coordinating committees, legislators, and members of licensing agencies.

TABLE 14

Differences Across Groups in the Comparative Importance Accorded Agency Characteristics

	Statement (paraphrased)		Comparative Importance[a] Low	Middle	High
129.	A program for training visiting team members is provided.	Admin.	23	35	41
		Faculty	47	13	40
		State	38	34	28
		Others	31	12	57
253.	The self-study is not sufficiently critical or analytic.	Admin.	12	29	59
		Faculty	13	45	42
		State	21	41	38
		Others	16	22	63
254.	Visiting teams are not adequately prepared.	Admin.	12	29	59
		Faculty	5	39	55
		State	12	50	38
		Others	10	18	72
576.	Procedures for observing a program's evaluation of its products are not clear.	Admin.	16	37	47
		Faculty	19	59	22
		State	23	56	21
		Others	28	33	39
240.	A self-study and site visit are required.	Admin.	0	8	92
		Faculty	5	18	76
		State	7	26	77
		Others	4	26	71
332.	Institutions or programs are evaluated with respect to their own purposes.	Admin.	26	35	39
		Faculty	58	18	24
		State	40	33	28
		Others	37	37	26
441.	The chief executive officer may respond to the visiting team report.	Admin.	20	51	29
		Faculty	29	66	5
		State	33	55	12
		Others	31	53	16
410.	The first evaluation is initiated by the chief executive officer of the institution or program.	Admin.	69	29	2
		Faculty	68	24	8
		State	72	24	3
		Others	72	20	8

TABLE 14
(Cont'd)

Differences Across Groups in the Comparative Importance Accorded Agency Characteristics

	Statement (paraphrased)		Comparative Importance^a		
			Low	Middle	High
520.	Ethical practices in recruiting and advertising are fostered.	Admin.	51	41	8
		Faculty	45	45	10
		State	41	52	7
		Others	39	41	20
541.	Standards of ethical practice in recruiting and advertising are not clear.	Admin.	53	31	16
		Faculty	42	45	13
		State	36	52	12
		Others	28	49	24
20.	Types of programs or institutions accredited are clearly defined.	Admin.	39	45	16
		Faculty	32	42	26
		State	16	41	43
		Others	35	37	27
41.	Levels of accreditation are clearly defined.	Admin.	24	55	22
		Faculty	13	63	24
		State	9	50	41
		Others	37	53	10

[a] Percentages were based on the following numbers of persons in each group:

Administrators	51
Faculty members	38
State officials	58
Others	51

In general, the Administrators and Others were more concerned than State Officials, and somewhat more than Faculty Members, with the detailed procedures of the evaluation process. The three statements related to the protection of the institution's or program's interests--332, 441, and 410--showed that Administrators gave higher importance to that issue than any other group. Two related pairs of statements also showed moderate differences. With respect to ethical practices in recruiting and advertising, Administrators and Others were at opposite extremes in their judgments of importance; the Others gave those two statements higher ratings of importance than did the Administrators, although most of the judgments of all four groups were in the middle range. Responses to the two final statements showed State officials more interested than the other three groups in clarity of function.

All the statements in Table 14, and a few more that were not related to any similar statement, showed differences of at least 25 percentage points between the two extreme groups in the cumulative percentage distributions. Since four groups rather than two were compared, these differences between extreme groups can be only suggestive.

The similarities among the groups in the judgments shown in Table 14, and in their judgments about the 21 statements not shown, are more striking than the differences. The differences that reached 25 or 30 or, at times, 35 percentage points between groups in the detailed percentage distributions shrank to 10 or 20 percentage points--or to virtually none for Statement 410--when the scales were collapsed to the three points shown in Table 14.

Though most of the differences still appeared, the range of percentages for any single statement at any single level of importance was comparatively small. For example, Administrators showed higher ratings than any other group on 332, 441, and 410, all statements concerned with the protection of the interests of the institutions. But the consistencies in all four groups of judges in their relative rankings of the various statements were far more impressive than their differences. Regardless of the group providing the judgments, there is no question that greater importance was attached to the chief executive officer's opportunity to respond to the visiting team's report (441) than to the initiation of the first evaluation only at the chief executive officer's request.

Occasionally, differences in the variability of responses were also consistent across groups. For example, a statement about evaluation with respect to the institution's own purposes (332) was more controversial than one about the opportunity of the chief executive officer to respond to the visiting team's report (441). The former consistently showed more judgments at both the high and low levels of importance than the latter, which most judges agreed belonged in the middle region of importance.

Even though the four groups of knowledgeable observers were quite different, their differing views seem less remarkable than their agreements. Administrators were more protective of the institution; state officials gave more weight to clarity of function or definition of purpose; and Others, the knowledgeable persons observing accreditation from outside the agencies and the institutions, were more concerned than the other groups with the evaluation process itself. But these were comparatively minor differences in emphasis. Overall, the four groups did not differ much in the comparative ranks assigned to the 33 statements that were ranked in three separate contexts. As shown in Table 15, the rank order correlations among the four groups ranged from .70 to .81.

TABLE 15

Rank Order Correlations Among Groups in Judgments of Importance

	Faculty	State Officials	Others
Administrators	.81	.79	.77
Faculty		.81	.78
State officials			.70

Among all four groups of judges, the following statements were ranked near the top in importance.

55. The agency publishes the standards by which institutions or programs are evaluated.

40. Procedures for granting, denying, withdrawing or reinstating accredited status at all levels are clearly described.

55. The agency publishes the standards by which institutions or programs are evaluated.

240. A self-study and on-site review are required which provide for the qualitative assessment of an institution's or program's strengths and weaknesses.

261. Each program or institution is given a copy of the visiting team's report, which indicates strengths and weaknesses and makes recommendations for improvement.

661. The agency's authority is broadly recognized by educational institutions, appropriate licensing agencies, and the relevant occupational field.

128. Written instructions, guidance, and consultation are provided for the self-study and on-site visit.

Of the 80 statements judged for importance by the agency directors, all but Statement 661 of the above group were in the top 15 (Table 6). Statement 661 fell about in the middle.

Of the 33 statements judged in three separate contexts by the four groups, the characteristics considered the least important for accrediting agencies are listed below. All were ranked in the bottom third by all the groups. Statement 15, on overlapping functions with another agency, was judged lowest of the 33 by all four groups.

15. The agency's functions overlap with those of at least one other agency.

71. The agency has external audits performed and made public.

410. The first evaluation of an institution or program is initiated in response to an application from the chief executive officer of the institution.

283. The agency has public representatives on its policy-making bodies.

580. Experimentation and innovation are encouraged.

350. The current approval statuses of institutions and the dates of the next scheduled review are available to the public.

570. Institutions or programs are required to submit regular reports indicating a continuing program of self-evaluation.

Statement 15 was not among the 80 the agency directors judged, but they placed the other six listed above in the lower half. None of the above statements, however, can be considered unimportant despite their comparatively low ranking. Because the outside judges ranked the various characteristics, they could not avoid placing some at the bottom of the list. At least half of the agency directors placed all six of the above statements in one of the top two categories of importance.

SUMMARY

Despite the generally high importance accorded all the statements, their relative importance was clearly and consistently agreed upon by virtually all groups of persons involved with or interested in accrediting. The occasional differences in the relative ranks assigned to characteristics of accrediting agencies by groups that viewed accrediting from different perspectives were less impressive than the similarities. This is an important observation. Accrediting standards and procedures have accepted meanings and importance that do not vary appreciably, either for different types of educational programs or in the views of different constituencies of accrediting. The principles of good accrediting practice that the recognition criteria are intended to reflect are broadly accepted and can be generally applied. The major area of uncertainty in the present criteria does not lie in the merit of the principles they embody, but in the translation of those accepted principles of good practice into observable agency characteristics. Standards, for example, must be clear and applied with care and fairness. But agreement is much less on whether standards require validation against the performance of graduates of accredited programs, or frequent monitoring by the agency through regular reports submitted by accredited programs. The specifics rather than the general principles are the source of conflicting views and of whatever weaknesses exist in the criteria.

VII. RELIABILITY

The recognition process, intended to identify effective accrediting and state approval agencies, is reliable to the extent that it can be carried out with comparatively little error. But because it is a complex process, involving difficult judgments of about 40 different aspects of agencies and their practices, it is vulnerable to error from a number of sources.

Initially, the information on which recognition decisions rest necessarily includes some error. The petitions submitted by agencies that desire recognition are limited and usually vary in the amount of detail they include, yet they must be relied on for much of the information about the agency. Even such an apparently clearcut matter as the length of time an accrediting agency has been operating may not be obvious. The point at which a professional association changed its functions to take on an accrediting role, and whether it was an accrediting agency before the change, are subject to different interpretations. The supplementary correspondence and observations by DEAE staff and consultants clarify uncertain issues, correct some misinformation, and add new information, but all error cannot be eliminated.

In short, the basic information on which the recognition decision rests cannot be a precisely accurate or complete representation of any particular agency. This source of error in the recognition process was examined indirectly by asking agency directors for their judgments about the degree to which specific agency characteristics related to the recognition criteria can be accurately observed--that is, to what extent the information is intrinsically vulnerable to error. A more direct check on this source of error--such as carrying out a more extensive set of observations of a number of agencies simultaneously with but independently of DEAE--was not feasible. Cost, as well as the inability to repeat earlier DEAE evaluations, prevented it.

Another way to identify error is to compare the nature of the information at different points in the recognition process. Much of the information starts with the agency's petition for recognition. This leads to a DEAE staff report based on the petition plus additional information gathered directly by DEAE. The fairly extensive staff report then is presented to the Advisory Committee and constitutes, with further oral discussion and any additional information provided by the agency, the primary basis for the Committee's recommendation to the Commissioner. Differences between the information in the petitions and the staff reports reflect both error and the additional information developed by the staff in visits, interviews, and observations. While the additional information and the error often cannot be easily separated, consistency between petitions and reports is one indication that comparatively little error has entered between those two steps in the process.

Finally, error enters the process as the Advisory Committee absorbs the information from the DEAE staff report, adds information from representatives of the agency and others appearing before the Committee, and reaches its decision. No group of 15 people can completely avoid the influence of individual perspectives or predilections in making collective judgments about anything as abstract as an agency's ability to determine educational quality. The careful specification of criteria, the quality of the information provided, the opportunity for representatives of the agencies to present their views, and the competence and varied backgrounds of the Committee members minimize but cannot completely eliminate error in the recognition decisions. Advisory Committee error will appear in inconsistencies from year to year in the nature of the agency characteristics that are most influential in the recognition decisions.

JUDGED OBSERVABILITY

Sixty of the 80 statements that agency directors had judged for importance were placed in a second questionnaire to elicit judgments of the accessibility of those agency characteristics to observation. The 20 omitted statements were all clearly observable, e.g., "The agency publishes the standards by which institutions or programs are evaluated." However, to assure a realistic spread in the responses, several statements of obviously observable characteristics were retained in the remaining 60. The 20 omitted statements were replaced by 20 other statements, usually related to the same criteria as the omitted statements, to bring the total number to be judged back to 80.

The agency directors judged each statement on a four-point scale of observability, with the four scale points defined in the following terms:

1. Rarely Determinable. The statement is, in its nature, difficult to support; the necessary supporting information cannot usually be acquired in a brief visit to an agency.

2. Requires Astute Judgment. The statement is supportable but requires experienced, perceptive observers and careful judgment; equally capable observers might disagree.

3. Requires Some Judgment. The statement requires the exercise of some judgment, but most observers would come to the same judgment after a brief observation of an agency's records and activities.

4. Readily Apparent. The statement reflects characteristics of the agency that are either a matter of public record or are readily apparent to an observer familiar with accrediting.

If a group of judges as informed as the directors of accrediting agencies were to agree that particular agency characteristics were difficult for knowledgeable persons to observe, the reliability of observations of those characteristics would be in serious doubt. Further, if most of the statements in the staff reports that referred to a particular criterion were consistently judged to be difficult to observe, the reliability of assessments of that criterion would also be questionable. While agency directors' judgments of observability are not without error, they are legitimate indicators of the probable reliability of some aspects of the recognition process. The questionnaire and its results are presented in Appendix F.

The several statements left in the questionnaire that described characteristics assumed to be readily observable were in fact judged to be so by the agency directors. For example, 89 percent of 93 responding directors agreed that "The types and levels of institutions or programs accredited are clearly defined in published documents," is a readily observable agency characteristic. Ten percent said its observation required some judgment.

The one person who said it required astute judgment may have been focusing on the phrase, "clearly defined," while the others accepted the existence of published documents as providing the primary evidence.

Of the 80 statements, 31 were judged by a half or more of the agency directors as being readily apparent. Another 36 were believed by at least a half of the directors to require only moderate judgment. The remaining 13 statements referred to agency characteristics that a half or more of the directors thought were rarely determinable or required astute judgment. Since 20 additional statements had been excluded as being obviously observable, a total of 87 out of 100 nonrandom but moderately representative statements that appeared in the DEAE staff reports referred to agency attributes that were reasonably open to view. The recognition process does not rest on qualities that are esoteric or difficult to observe. If that were the case, the reliability of the process would be in doubt.

Nevertheless, 13 of the statements referred to qualities judged difficult to observe, and decisions influenced by any of those 13 qualities would have questionable reliability. In Table 16, those statements and the 31 judged readily accessible to observation are presented with the median values of their judged observability. The median values state the point on the scale from 1 to 4 below which half the judgments fell--that is, the midpoint of the judgments.

TABLE 16

Observability of Agency Attributes

Criterion	Statement	Median Judgment (N = 93)
	Readily observable	
b3iv	441. The chief executive officer of the evaluated institution or program is given an opportunity to respond to the visiting team report.	3.94
b1ii	20. The agency's purposes and/or statutory authority are clearly stated and made publicly available.	3.94
a1ii	21. The types and levels of institutions or programs accredited are clearly defined in published documents.	3.92
b3iii	261. Each institution or program is given a copy of the visiting team's report, which indicates strengths, weaknesses, and recommendations for improvement.	3.92
b2i	283. The agency has public representatives on its policy-making bodies.	3.89
b3v	450. At least one member of the visiting team is required to be present at the evaluation of the visiting team report.	3.88
b3viii	500. Adverse decisions are followed by a hearing at which representatives of the affected institution or program may appear.	3.86

TABLE 16
(cont'd)

Observability of Agency Attributes

Criterion	Statement	Median Judgment (N = 93)
	Readily observable	
b3ii	272. Visiting teams engage in discussion with faculty, administrators, and students.	3.82
a2ivA	124. Institutions or programs to be evaluated may recommend or reject particular visiting team members.	3.81
b6	570. Institutions or programs are required to submit regular reports indicating a continuing program of self-evaluation.	3.79
a3i	40. Procedures for granting, denying, withdrawing, or reinstating accredited status at all levels are clearly described.	3.78
a3i	41. The definitions of each level of accreditation or approval granted are clear and well-differentiated.	3.78
b1	5. The agency is the only accrediting or approval body for its purpose in its region.	3.77
b3vi	460. Accreditation is withdrawn only after due process, for cause, and with due notice.	3.76
b2iii	380. Standards are not revised until after interested groups have had an opportunity to react to the proposed revisions.	3.72
b3ii	281. Solicitation of the views of students is part of the accreditation or approval process.	3.71

TABLE 16
(cont'd)

Observability of Agency Attributes

Criterion	Statement	Median Judgment (N = 93)
	Readily observable	
d2	743. Members of the decision-making body do not participate in discussions or decisions affecting institutions with which they are affiliated.	3.70
d2	484. Appeal procedures include safeguards against bias; e.g., no one involved in the original decision may serve on the appeal committee.	3.70
b2iv	390. Written procedures provide for fair and timely treatment by the agency of complaints against institutions or programs.	3.69
a3iii	240. A self-study and on-site review are required that provide for the qualitative assessment of an institution's or program's strengths and weaknesses.	3.69
a3iii	260. Visiting teams are concerned with instruction, resources, management, and student services; all four areas are covered.	3.66
b3ii	270. Faculty members are given opportunities to make their views known to the agency.	3.65
b6	572. The agency monitors continuing compliance with standards through regular reports submitted by institutions or programs.	3.65
b1i	282. Members of appropriate academic, occupational, or professional fields have a role in the accreditation or approval process.	3.64

TABLE 16
(cont'd)

Observability of Agency Attributes

Criterion	Statement	Median Judgment (N = 93)
	Readily observable	
b5	552. The agency regularly reviews its standards, policies, and procedures by inviting suggestions from various interested groups.	3.61
a1i	6. Most programs or institutions in its field or jurisdiction seek accreditation or approval from the agency.	3.58
b5	642. Information regarding standards and guidelines for the conduct of site visits is exchanged with other accrediting agencies.	3.57
a2iv	110. The agency selects its personnel in accordance with nondiscriminatory practices.	3.54
a3ii	220. Procedures for the move from pre-accreditation to full accreditation are provided and appropriately related.	3.52
b9	598. When circumstances warrant it, institutions or programs are reevaluated at intervals shorter than the normal cycle.	3.52
c1	661. The agency's authority is broadly recognized by educational institutions, appropriate licensing agencies, and professional or occupational fields.	3.52
	Difficult to observe	
d2	712. Through its structure and procedures the agency eliminates politically-based decisions that may adversely affect the quality of education.	2.45

TABLE 16
(cont'd)

Observability of Agency Attributes

Criterion	Statement	Median Judgment (N = 93)
	Difficult to observe	
b8	603. The agency tempers its evaluative role so as not to endanger the reputation or the accreditation or approval status of its institutions or programs.	2.41
b1	--. The agency exists solely for purposes of determining eligibility for federal funding; it serves no other need.	2.35
d2	--. The agency's public representatives have vested interests in the accrediting or approval body or its constituents.	2.30
b1i	284. Accreditation or approval by the agency assures that graduates are occupationally or professionally qualified for appropriate employment.	2.24
b6	575. The agency's review of institutions' or programs' annual reports is not thorough enough to ensure that schools or programs adhere to standards.	2.12
b5	334. The agency's evaluative program of its standards is weak, poorly conceived, or marginally effective.	2.11
b4	538. The agency fails to monitor the fraudulent use of student aid funds by institutions or programs.	2.11
b3iii	251. The reliability of the visiting team report is questionable.	2.00
b8	--. Accreditation or approval by the agency is not a reliable indicator of either institutional integrity or viability.	1.97

TABLE 16
(cont'd)

Observability of Agency Attributes

Criterion	Statement	Median Judgment (N = 93)
	Difficult to observe	
b5	335. Some of the agency's standards are questionable or not demonstrated to be valid or reliable.	1.96
b8	--. The agency's accreditation or approval assures the expenditure of student and government moneys in an educationally effective and economically productive manner.	1.92
d2	728. The accreditation or approval conferred by an agency has been distorted by political expediency.	1.84

The Observable and Difficult-to-Observe Qualities

The readily observed characteristics of agencies concerned matters of procedure or structure that are described in public documents. The characteristics judged difficult to observe required evaluative judgments about the effectiveness of the procedures. The following two statements and their median ratings illustrate the difference in observability between the existence of formal procedures and their effectiveness.

572. The agency monitors continuing compliance with standards through regular reports submitted by institutions or programs.

575. The agency's review of institutions' or programs' annual reports is not thorough enough to ensure that schools or programs adhere to standards.

The first statement, which refers to a question of procedure, had a median rating of observability of 3.65, which places the midpoint of the judgments a little higher than midway between "Requires Some Judgment" and "Readily Apparent." The second statement, calling for a judgment of effectiveness, had a median rating of 2.12, barely above "Requires Astute Judgment."

For the most part, the attributes difficult to observe were not associated with any particular set of criteria. Most of the criteria refer to an agency's structure and its formal procedures, and the specific observations associated with each criterion tend to span a fairly broad range of observability. The two statements above are illustrative; both are associated with Criterion b6, which refers to ongoing programs of institutional self-evaluation.

An exception was the set of criteria concerned with the agency's integrity. Of sixteen statements in that group (Appendix F, p.7), only three were judged reasonably accessible to observation. These referred to the disqualification of board members in decisions affecting their institutions (Statement 743), broad recognition of the agency's authority (661), and policies protecting against conflict of interest (64). The other 13 were all in the lower half of the 80 statements with respect to observability. The observable attributes are procedural, as in the policy preventing members of the decision-making body from participating in decisions about their own institutions. Most of the qualities related to integrity, however, call for judgments--whether decisions are fair and unbiased, whether ethical practices are fostered, and whether members of the decision-making body are able to make reliable decisions.

Overall, the agency directors' judgments indicated broad agreement that most of the criteria, and the specific characteristics associated with them, were reasonably accessible to observation. The exceptions were the criteria related to integrity, and those concerned with standards, although to a lesser degree, as is demonstrated in the statements listed in Table 16.

Observability and Importance

The attributes judged most important to an agency's ability to evaluate educational programs were described in Chapter VI. They are associated dominantly with procedural issues--in evaluating programs, in reaching decisions, and in assuring due process and fair treatment. The existence of established procedures is both important and observable. At least as important, but much more difficult to observe, are the desired consequences of the procedures--that only qualified programs or institutions are accredited, that decisions are fair, and that staff and financial resources are adequate for carrying out an effective program. These general observations are presented in more detail in Table 17, which contrasts the observable and difficult-to-observe statements judged high in importance.

TABLE 17

Observability of Important Attributes

Criterion	Statement	Rank Order of Importance (N = 80)	Rank Order of Observability (N = 80)
	Observable		
a3iii	240. A self-study and on-site review are required that provide for the qualitative assessment of an institution's or program's strengths and weaknesses.	1	20
b3ii	272. Visiting teams engage in discussions with faculty, administrators, and students.	3	8
b3iii	261. Each institution or program is given a copy of the visiting team's report, which indicates strengths, weaknesses, and recommendations for improvement.	4	4
b3vi	460. Accreditation is withdrawn only after due process, for cause, and with due notice.	6	14
a3i	40. Procedures for granting, denying, withdrawing, or reinstating accredited status at all levels are clearly described.	14	11
b3iv	441. The chief executive officer of the evaluated institution or program is given an opportunity to respond to the visiting team report.	19	1

TABLE 17
(cont'd)

Observability of Important Attributes

Criterion	Statement	Rank Order of Importance (N = 80)	Rank Order of Observability (N = 80)
	Difficult to observe		
b8	593. Written procedures clearly assure that only qualified institutions or programs are accredited or approved.	7	41
b8	591. The agency's decisions reflect fair and consistent application of its standards.	8	55
b8	590. The agency's published procedures are fairly applied; its actions are consistent with its procedures	11	48
a2i	50. The staff is able to carry out the agency's activities with care and without undue delay.	16	43
a2ii	72. The agency has the financial resources to carry out its activities effectively.	17	44

The first six statements in Table 17, which describe important, readily observed attributes of accrediting agencies, are related to procedures and due process, as is indicated by the criteria with which they are associated as well as by their content. All six were ranked in the top quarter in both importance and observability. The last five statements, which deal with integrity, fairness, and organizational effectiveness, were also in the top quarter with respect to importance, but ranked in the lower half in observability.

In short, then, the collective judgment of the agency directors and the five other groups of knowledgeable persons showed a gap between the observability of the existence of standard operating or evaluational procedures and the consequences of those procedures. This is a wholly understandable distinction. Written policies can prescribe activities for evaluation and decision making that are ordinarily sound and effective, and the existence of those policies is not hard to determine. But whether the policies, as implemented, do in fact result in sound decisions is more difficult to assess. The reliability with which effects are determined can be expected to be appreciably lower than the reliability with which the existence of appropriate policies is determined.

Most of the criteria cover observable, procedural characteristics that are widely judged to be desirable. Some, however, address more subtle issues that are not readily observable. The most important of the difficult-to-observe criteria were a2i and a2ii, which deal respectively with the administrative effectiveness and financial strength of the agency, and Criterion b8, a comprehensive one that requires accuracy of judgment, fairness, and impartiality in the accrediting process. Criteria d1 and d2, which refer to autonomy and the prevention of conflict of interest, were considered almost as important as those listed in Table 17, and they were also judged difficult to observe.

These five criteria, then--a2i, a2ii, b8, d1, and d2--were those where importance and difficulty of observation combined to suggest a need for stronger evaluative or observational procedures. Elaboration and clarification of those criteria might lead to more reliable observations.

CONSISTENCY BETWEEN PETITIONS AND DEAE STAFF REPORTS

Two major steps in the recognition process are the agency's petition for recognition, which states the agency's characteristics pertinent to each criterion, and the DEAE staff report to the Advisory Committee, which summarizes information about the agency, again in relation to each criterion. Differences between the two documents imply that one is in error. Whether the error is in the staff report or in the petition cannot be determined simply from the existence of a difference, but frequent differences will indicate high rates of error at some point. Infrequent differences will suggest few errors and high reliability.

The most direct way to compare the accuracy with which information in the petitions is transferred to the DEAE staff reports is to list the content of both documents and compare them. While not an entirely satisfactory process, that was done for a sample of 34 agencies evaluated after the 1974 criteria had been in effect. One difficulty was due simply to the bulk of the petition documents. In many cases they were several inches thick and included handbooks, annual reports, policy statements, and correspondence in addition to a lengthy narrative describing the agency's way of satisfying each criterion. An ETS staff member other than the one who coded the corresponding staff report read each set of documents and coded them in terms of the same descriptive statements used to code the staff reports. Thus two sets of statements descriptive of the same agency were produced, one based on the petition and the supporting document that accompanied it, and one based on the staff report.

Kappa was computed as a measure of similarity among all pairs of agency petitions and staff reports (see p. 72). In this context, kappa is a measure of the degree to which two sets of statements approach perfect agreement from a base equivalent to random agreement. Its range, for all pairs of petitions and reports, was from small negative values, indicating less agreement in actuality than would be expected from random assignment of statements to petitions and staff reports, to approximately .80, with a mean of .37. This distribution of kappas was closely approximated whether the similarity was between staff reports, between agency petitions, or between staff reports and petitions of different agencies. If the descriptive statements were assigned randomly to the agencies, the mean value of kappa, or the mean similarity between agencies, would be close to zero. The value of .37 between different agencies reflects the lack of independence among the statements. The appearance of some statements as descriptive of an agency may increase or decrease the probability that other statements will also apply to that agency. For example, a statement that an agency fails to comply with a particular criterion increases the probability that other unfavorable statements related to that criterion will appear and decreases the probability that favorable related statements will appear. Some general degree of similarity, represented by the mean kappa of .37, was to be expected.

The values of kappa between petitions and staff reports of the same agencies should be appreciably higher than the values between petitions and staff reports of different agencies. The distribution of those values--the 34 values of kappa for which the petition and staff report referred to a common agency--ranged from .15 to .66 with a mean of .47 and a standard deviation of .14. Although no standard exists against which such values can be evaluated, two descriptions of the same object ought to be substantially more similar than two descriptions of different objects. The increase to .47 from an overall mean of .37--about two-thirds of a standard deviation--seems less substantial than might be expected.

The limited degree of comparability between petitions and staff reports can be attributed to several obvious sources of possible error. First, the material in the petitions was often extensive, discursive, and the result of idiosyncratic interpretations of the recognition criteria. Two persons reading those documents and summarizing the agency characteristics pertinent to the criteria would be expected to produce somewhat different descriptions. Supplied with some information that was ambiguous and other information that was only marginally pertinent to a particular criterion (or sometimes irrelevant even though descriptive of some desirable attribute of the agency), they would almost inevitably respond with different summary descriptions. Second, the staff report included material derived from sources other than the petition, such as a visit to the agency or the observation of a visiting team or commission meeting. Third, the process of coding both the petitions and the staff reports, and assigning some subset of a group of standard statements to the document, was difficult to carry out precisely.

The extent of this third source of error was estimated by having a small group of staff reports coded by several persons. Kappas calculated between pairs of coders assigning descriptive statements to the same staff report ranged from .55 to .75 with a mean of .65 and standard deviation of .06. This represents the level of agreement reached after the coders had read several reports; coded several more; discussed and revised the catalog of descriptive statements; coded several more reports; reviewed the work of other coders; and finally agreed on interpretations of the meaning of the statements and procedures for resolving ambiguities.

Intercoder agreement on the order of .80 is desirable and sometimes achieved, but that level is usually limited to situations where one object is to be assigned to one classification in a group of five or six, as when psychiatric patients are classified into diagnostic categories. In the present study, the coders assigned 30 to 100 statements to each agency from a total list of 559. The opportunity for disagreement to enter into such a situation is obviously great. The utility of judgments that show intercoder agreements of the magnitude achieved is therefore difficult to assess apart from the results produced by those judgments in other analyses where low reliability would be a limiting factor. The success of the multidimensional scaling analysis in discriminating among agencies according to whether they had been recognized or not indicates a level of reliability in the assignment of attributes to agencies great enough to produce interpretable results.

The level of agreement between the descriptions of agencies based on petitions and those based on staff reports can be evaluated in relation to the values of kappa associated with intercoder agreement. With a mean intercoder kappa of .65 and standard deviation of .06, a rough upper limit of about .70 is the best that can be expected in comparing staff reports and petitions. Some value between .35 and .70 should therefore be expected. The achieved mean value of .47 is still not great. The additional gap up to .70 represents both the additional information that entered the staff reports and the difficulty in applying statements derived from staff reports to the more diffuse content of the petitions. The observed level of agreement, however, is not high enough to resolve all doubts about the accuracy of the information on which recognition is based.

A further study of the source of the discrepancies between petitions and staff reports--whether from poorly prepared petitions, from new information entering the process from sources other than the petitions, or from coding inaccuracies by ETS staff--would be desirable. Discrepancies attributable to the first source would suggest the need for changes in the guidelines for the preparation of petitions. (In anticipation of this result, DEAE commissioned the preparation of new guidelines, which constitute Part III of this report). Discrepancies that arise from the second source may also be reduced by improvements in the organization or content of the petitions. Coding inaccuracies are not errors in the recognition process, but estimates of their magnitude will suggest how much additional error remains between petitions and staff reports.

Some errors are inherent in the translation of petitions and reports into sets of standard statements. The need to represent two slightly different pieces of information with the same statement, and the treatment of two statements dealing with related content as totally distinct, are two inherent sources of error.

Comparisons between petitions and reports at a level of generality broader than the statements themselves would reduce the effects of those two sources of inaccuracy.

Multidimensional scaling (MDS) analyses were therefore carried out with similarities among agencies based on the petitions and independently for the same agencies with similarities based on the staff reports. The two sources of information are functionally equivalent if they lead to similar distinctions among the agencies --that is, if they place the agencies in similar relative positions in a multidimensional space. A simple comparison of the two MDS solutions, however, based on correlations between projections of the 34 agencies on each of the three dimensions of the two solutions, would not be appropriate. Differences in the orientation of the dimensions in the two solutions would affect the projections and make direct comparisons meaningless. A procedure was used, therefore, that places the two solutions in a common multidimensional space and rotates the dimensions of that space to bring the two representations of each agency as close together as possible (Kaiser, Hunka, & Bianchini, 1971). "Correlations" between the two sets of dimensions then indicate the overall agreement between the two solutions and, in the present study, the degree of congruence in the discriminations made from the petitions and from the staff reports. "Correlations" is placed in quotation marks because their calculation is not based on separate observations of each dimension for each of the 34 agencies, which would be the usual basis for correlation coefficients. Yet because they are the cosines of the angles between the three pairs of dimensions, which is the geometric interpretation of a correlation coefficient, they can be interpreted as such.

TABLE 18

Correlations Between MDS Dimensions of Petitions and Staff Reports

Dimensions of petitions	Dimensions of staff reports		
	1	2	3
1	.78	.57	.26
2	-.36	.75	-.56
3	-.51	.35	.79

All three dimensions were reasonably congruent, with the three correlation coefficients all at .75 or higher, as shown in Table 18. The general issues or perspectives that discriminated among the agencies as described in their petitions were therefore closely related to the discriminating concepts in the staff reports.

The congruence between the petitions and staff reports with respect to the general distinctions they make among agencies is as high as the reliability of the coding process. That could not occur unless the real differences in content between petitions and staff reports, as well as the differences due to coding errors, involved specific details rather than general agency characteristics. The important, overriding distinctions among agencies are therefore reasonably well preserved in the passage through the recognition process.

CONSISTENCY IN DECISIONS FROM YEAR TO YEAR

A direct approach to assessing the reliability of a measurement process is to examine the consistency of the results as the process is applied repeatedly to the same object or to objects known to be similar. In the evaluation of accrediting agencies, such a process would require that a sample of agencies be evaluated independently by different persons at about the same time and the results compared. The level of agreement between those independent applications would indicate the reliability of the process. The infeasibility of that direct assessment of consistency led to the use of an approximation to it.

The procedure followed was to assess the consistency from year to year in the general qualities that distinguished among agencies evaluated differently by the recognition process. The decisions--the assignment of an agency to one of five recognition levels, from denial to recognition for four years--did not retain enough information in themselves to be a useful indicator of consistency or absence of error in the decision process. The same decision could result from too many different combinations of agency characteristics. The statements presented the same problem in reverse. Different statements referring to similar agency characteristics and producing similar results would give a false indication of lack of consistency. Consistency was therefore examined in the ways the statements were organized into general qualities.

The statements that appeared frequently but not universally in the DEAE staff reports described the qualities of accrediting agencies on which recognition decisions primarily are based. At times, an unusual deficiency was severe enough to enter heavily into a decision, but by definition that was a rare occurrence. The recognition process in general hangs on the consistently recurring content of the DEAE staff reports, which are organized around the published criteria.

Particular statements that appeared in the reports often referred to different aspects of an agency related to some more general quality. Two such statements, for example, that were related to a common general quality are the following:

> Adverse decisions are followed by a hearing at which representatives of the affected institution or program may appear.
>
> Visiting teams include at least one person who is not a member of the agency's policy-making body or administrative staff.

These statements are clearly distinct; neither implies the other. Yet these two and several others, all related to procedures for assuring due process, were mutually related, indicating a general agency quality. If the recognition process operates reliably, the statements that discriminate among agencies will consistently show similar relationships, indicating that the same general qualities are reflected in the decisions.

During the eleven-year period that was studied, two sets of criteria were applied. A revised set of criteria was put into effect in mid-1974, creating a systematic difference in the recognition process as applied before and after that time. Further, the composition of the Advisory Committee changed by 25 percent each year, which resulted in a complete turnover in membership every four years. Slight differences in the nature of the decisions, the effect of differences in emphases and interpretations of different Committee members, were therefore to be expected from year to year, possibly becoming greater over time as the dominant issues in postsecondary education changed. Both these sources of possible inconsistency in the decision process--the sharp change with the introduction of the 1974 revisions in the criteria and the gradual changes resulting from changes in personnel and circumstances--were balanced in evaluating consistency over time by comparing the general qualities observed in odd-numbered years with those observed in even-numbered years.

The procedure developed by Kaiser, Hunka, and Bianchini (1971), described in the preceding section, was used to compare general qualities across odd-numbered and even-numbered years, as expressed in the factor patterns of the descriptive statements that appeared in the 234 staff reports associated with the 234 recognition decisions made from 1968 to 1978. The three 1968 decisions, which preceded the 1969 revision of the criteria, and 16 decisions for which fewer than 20 descriptive statements appeared in the staff reports were excluded. The two sets of odd-year and even-year decisions therefore had slightly more than 100 decisions in each. Because a factor analysis requires several times as many cases as variables to provide stable results, only a few more than 30 statements could be factored at a time. Two groups were selected, one of 36 statements and one of 35, based on earlier factor analyses. The statements selected were those most highly related to each of the factors identified earlier. Although a few statements were common to both, the two groups represented essentially different groups of criteria.

From prior analyses, each group of statements was expected to form six factors at the most. The analyses bore out that expectation, with the sixth factor at times questionable. The relationships among six factors from odd-year staff reports and six from even-year reports appear in Table 19.

TABLE 19

Relationships Among Factors for Odd and Even Years

Factors from 36 statements

Odd-year factors	Even-year factors					
	1	2	3	4	5	6
1	92	05	-15	-12	-05	34
2	07	95	10	04	10	-26
3	20	-11	09	96	06	-14
4	07	-04	97	-08	02	21
5	00	-07	-05	-05	99	10
6	32	27	-13	24	-06	86

Factors from 35 statements

Odd-year factors	Even-year factors					
	1	2	3	4	5	6
1	61	76	-20	00	07	-13
2	-12	31	76	07	-51	-21
3	77	-49	33	05	-06	22
4	-08	10	-02	94	06	30
5	-08	11	51	-06	85	-02
6	-11	27	09	-32	-10	89

Notes: a. The figures in the body of the table can be interpreted as correlation coefficients.

b. Decimal points have been omitted.

Of the 36 statements that provided the factors for the top half of Table 19, the six factors for even and for odd years are highly consistent. They show correlations with each other from .86 to .99. The only deviation from high values in the diagonal and low values in the off-diagonal entries in the table occurs through the reversal in order of Factors 3 and 4. Those 36 statements were therefore applied in highly consistent ways from 1969 to 1978. The observations related to due process, evaluative procedures, administrative effectiveness, and other qualities that coincide closely with the factors described in Chapter IV did not shift in meaning or focus from one year to another.

The lower half of Table 19 shows slightly lower and less clearcut relationships among the set of 35 statements for odd and even years. While the last three factors are closely comparable, with correlations ranging from .85 to .94, the correlations among the first three factors are .76 or .77, and these three factors are not so clearly defined. Factor 1 for the odd years, which is concerned with due process and includes some of the same statements as Factor 1 for the group of 36 statements, is closely related to both Factors 1 and 2 for the even years. Similarly, Factor 1 for the even years is highly related to both Factors 1 and 3 of the odd years.

The factors reflect groups of statements that tended to occur together and to be jointly absent in DEAE staff descriptions of accrediting agencies. The high relationships in Table 19 show that the composition of those groups of mutually occurring statements was quite constant. The same relationships among statements, the same interpretations of the discriminating criteria, were therefore reflected in the DEAE staff descriptions of agencies regardless of the year in which the descriptions were written.

The minor departures from consistency that reduced the agreement among the first three factors of the 35-statement group illustrate the nature of the consistency that produced the high values in the rest of Table 19. Factor 1 for the odd years is defined by eight statements related to appeal procedures, due process, protection against conflict of interest, and concern for the interests of all constituencies. For the even years, Factor 1 is related to appeal procedures and Factor 2 to due process, conflict of interest, and concern for all constituencies. At times the distinctions among those concepts were apparently blurred, or different interpretations at different times may have shifted their meaning. In general, though, the distinctions among agencies described in the staff reports remained quite constant.

Finding that the agency characteristics described in staff reports formed consistent patterns of relationships is not equivalent, however, to finding that the process through which recognition decisions are reached is consistent enough to produce the same decisions on repeated applications of the process to the same agencies. That hypothetical situation cannot be observed. Nevertheless, if the information entering the staff reports were not reliably observed and recorded, the likelihood would be low that factors based on two independent sets of observations would show the degree of congruence displayed in Table 19. The results therefore support a conclusion that the information on which decisions are based is reliable. Whether the information and the decisions are correct or not is an issue of validity.

Because some statements were common to both, the two sets of factors included only about 60 statements. Yet those comparatively few statements were the ones that provided the greatest discrimination among agencies and therefore had the greatest influence on the decisions. If they represented reliable information, a major part of the information on which the decisions rest is reliable.

SUMMARY

Three indirect but complementary approaches were used to evaluate the reliability of the recognition process.

1. Accrediting agency directors provided judgments of the observability of many of the agency characteristics on which the recognition decisions rest. Of 100 statements, 70 were judged to be reasonably observable. The statements referring to

qualities judged not readily observable dealt, in general, with the effectiveness of an agency's procedures, while the observable statements concerned the existence of particular procedures. This is an obvious kind of distinction, but it points up the desirability of developing at least partial standards for evaluating the effectiveness of evaluation procedures, the fairness of decisions, the adequacy of an agency's staff, and other critical but subtle and elusive qualities.

Although most of the qualities judged difficult to observe were scattered among the various criteria, and many were balanced by other more easily observed attributes that referred to the same criterion, the statements in a general group related to various aspects of an agency's integrity were almost uniformly judged difficult to observe. Coupling judgments of importance with judgments of observability showed these qualities and a few others associated with five criteria to be both important and difficult to observe. The criteria related to the accuracy and fairness of accrediting decisions, administrative and staff effectiveness, financial soundness, autonomy, and prevention of conflict of interest are the five that most need further development if they are to be reliably applied.

2. Assessment of the degree to which the information in the DEAE staff reports was a reliable statement of agency characteristics produced mixed results. A direct measure of

agreement between staff reports and agency petitions was not as high as might be expected, although the magnitude to be expected is difficult to estimate. In contrast, the general distinctions among agencies that led to different recognition decisions were quite closely matched when derived independently from the petitions and the staff reports. A detailed study of the discrepancies between the two sources of information could either show them to be artifacts of the present study or suggest further steps to reduce them--beyond clarifying the specifications for the information desired in the petitions, a step that has been taken with the preparation of new guidelines (Part III of this report).

3. For the 10-year period from 1969 to 1978, the general qualities that determined recognition status were consistently interpreted from one year to the next. Interpretations did not change with changing emphases, contexts, and personnel. Error in the process was small enough in relation to the total amount of information involved that major inconsistencies or departures from established standards were rare. In short, the agencies recognized for four years and the agencies denied recognition showed the same kinds of differences in 1978 that they showed in earlier years.

In its general aspects, the recognition system operates reliably. Most of he criteria are clearly enough defined and refer to qualities of agencies open enough to observation that the decisions reached are comparable for similar agencies and from year to year. A few of the criteria, though, refer to the effects of an agency's procedures rather than to whether good operating procedures are followed. The application of these criteria, which are related to fairness, integrity, organizational strength, and effectiveness of evaluative procedures, would be strengthened through detailed study to clarify their definitions, implications, and requirements. Procedures probably can be devised, for example, to identify the incidents likely to interfere with impartial judgments or fair application of standards and to minimize the frequency of their occurrence. Those criteria for effective educational evaluation could then be as reliably observed as the others.

VIII. VALIDITY

The validity of a process is the degree of confidence in the inferences drawn from that process that rests on an empirical base. Validity is attached not to the process directly, but to the inferences. The primary inference to be drawn from the recognition process is that recognized agencies provide accurate judgments of the educational quality of the programs or institutions they evaluate. In the absence of indisputably correct knowledge of the evaluative accuracy of the roughly 100 accrediting and state approval agencies that have sought recognition, indirect evidence of the merit of the inferences drawn from the recognition process was developed.

Three kinds of evidence of validity were provided. The first was an empirical differentiation of agencies on the basis of the detailed information about them that entered the recognition decisions. If the recognition process discriminates appropriately among agencies, those recognized should be empirically differentiable from those denied recognition. Further, the nature of the differentiating attributes should be widely accepted, by persons recognized as knowledgeable, as important and appropriate distinctions between agencies that are effective and those that are not in the evaluation of educational quality. Both these conditions were met, although so many elements enter both the accrediting and recognition processes that some inferences drawn from the recognition decisions are more fully justified than others.

The second source of evidence was the judgments of directors of accrediting and state approval agencies and other knowledgeable persons as to the importance of the various elements of information associated with the recognition criteria. These judgments not only indicated the appropriateness of the distinctions among agencies, but also provided evidence of the clarity of the interpretations attached to individual criteria.

The third source of evidence was a set of simulated judgments by a widely diversified group of informed persons, including agency directors, who made their own recognition decisions based on the same information that had entered the actual decisions made by the Commissioner of Education. While most of the evidence of validity and reliability was related to components of the recognition process, these judgments addressed the merit of the process as a whole.

DISCRIMINATING NATURE OF THE DECISIONS

In Chapter V, the ways in which agencies were differentiated by the DEAE staff reports were described through multidimensional scaling of the agency descriptions. In general, the agencies denied recognition were widely separated from the other agencies. The analyses described involved two random samples of agencies which included comparatively small numbers of agencies that had been denied recognition. Those analyses showed the major distinctions made in the DEAE staff reports among all agencies as a total group. But almost half of the decisions made after 1974, when the current criteria were being used, have been for recognition for four years. Each of the other four types of decision, from denial to recognition for three years, accounts for from 10 to 15 percent of the decisions since 1974. Because of that uneven distribution of decisions, the distinctions associated with different decisions were not as clear in the earlier analyses as they might have been.

To examine each type of decision more closely, rather than all the decisions as a total group, a new sample of 50 DEAE staff reports was formed, consisting entirely of regional or specialized agencies recognized or denied recognition in 1975 or later. Ten agencies were randomly selected to represent each of the five types of decisions--denial, and recognition for one, two, three, or four years. The multidimensional scaling (MDS) process described earlier was applied to this sample of 50 staff reports. The results are presented in Figure 4.

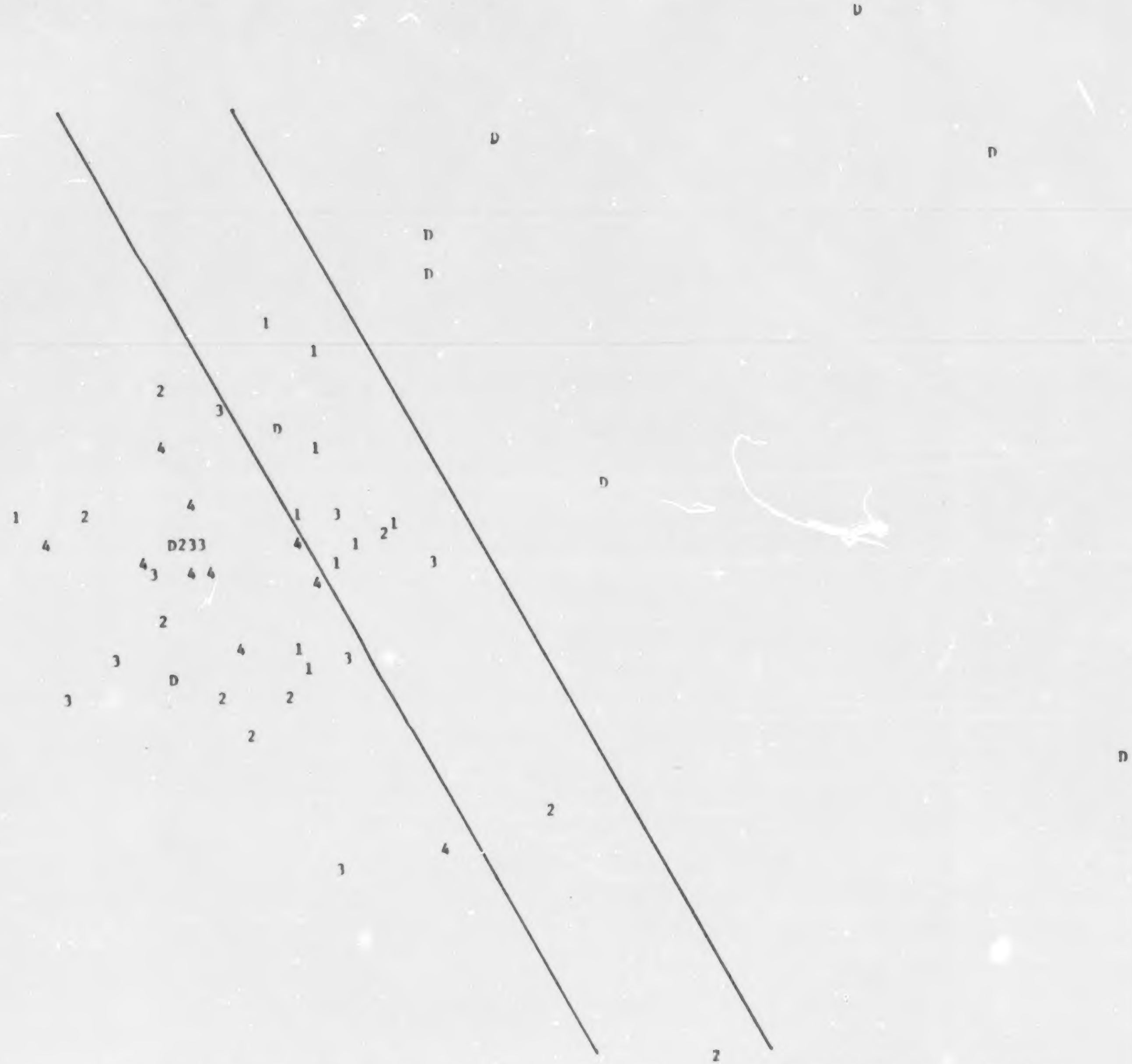

Figure 4. Differentiation of agencies receiving different recognition decisions. (Symbols represent recognition for one, two, three, or four years, and denial of recognition.)

The two-dimensional plot in Figure 4 represents the similarities among agencies as described in the staff reports. The smaller the distance between any two symbols, the more similar were those agencies in the DEAE staff descriptions. Similarity was measured in terms of the number of descriptive statements that were common to any pair of agencies. Agencies with comparatively large numbers of descriptive terms in common would be expected to appear close to each other in Figure 4. If the recognition decisions reliably reflect differences in agency characteristics, different decisions should appear in different regions of Figure 4. If the decisions are also valid, the differences will be associated with the merit of the agencies' judgments of educational quality.

Most of the agencies are clustered to the left of center in the figure. Thirteen agencies scatter vertically and to the right of the major group. Those 13 include seven of the 10 denied recognition, two recognized for one year, two recognized for two years, one recognized for three years, and one for four. The agencies that differ most from the central group were clearly those identified in the recognition process as deficient. Moreover, they were not deficient in similar ways; they do not form groups of agencies with common deficiencies. The agencies denied recognition differ among themselves much more widely than the 37 agencies that form the main group. Nine of the 10 agencies recognized for four years form a still tighter group at the center of the main group.

Two parallel lines have been drawn in Figure 4 that separate it into three regions. They slant upward to the left, establishing a region to the right and the top of the figure that includes seven agencies, all denied recognition. Between the two lines is a region of transition where 7 of 13 agencies were recognized for only one year, one was denied recognition, and five were recognized for two or three years. To the left of both lines are 30 of the 50 agencies--the ten agencies that were recognized for four years, eight of the ten agencies recognized for three years, seven of the ten recognized for two years, three of the ten recognized for one year, and two of those denied recognition.

The arrangement of agencies in Figure 4 shows a clear separation of most of the agencies denied recognition from the others, and the location of most of those recognized for one year is in a region between the denied agencies and the rest of the agencies. All but one of the agencies recognized for four years are tightly clustered in a small region. Only agencies recognized for two or three years--presumably those with some deficiencies, none of them severe--are not clearly differentiated. For that degree of clarity of separation to occur among agencies given different recognition decisions from 1975 to 1978, the reliability of the decision process had to be at least moderately high. Lack of consistency, or error in the process, would have produced similar decisions for agencies that did not show similar characteristics, and agencies with the same recognition status would have been scattered throughout the figure.

The measure of similarity that produced the pattern of Figure 4 had some degree of error unavoidably built into it, as was pointed out in Chapter V. The measured similarities are almost certainly underestimates of the true similarities. The actual discrimination among agencies in different recognition statuses is therefore likely to be greater than is shown in Figure 4.

The MDS Dimensions

While reliability in the recognition process was required to produce the discrimination in Figure 4, validity lies with the meaning that can be attached to differences between agencies at different locations in the figure. That meaning can be determined by identifying the statements that are characteristic of agencies at opposite ends of the horizontal and vertical dimensions.

The horizontal dimension combined three important groups of agency characteristics. The farther an agency is located to the right in Figure 4, the more likely it was to have had weak evaluation procedures, to have had a governing board not fully representative of all constituencies or the general public, and to have left some doubt about its impartiality. As agencies appear farther to the left, they were more likely to be strong in those three areas. In Table 20 are the statements that tended to characterize agencies at opposite ends of the horizontal dimension.

TABLE 20

Statements Characteristic of the Horizontal Dimension of Figure 4

Characteristics of the Left End	Characteristics of the Right End
Evaluative procedures	
120. The agency uses competent people on visiting teams. 129. The agency prepares visiting team members through workshops, training sessions, or similar activities.	253. Self-study procedures are deficient in that they do not provide for sufficiently critical or analytic assessment of strengths and weaknesses. 254. The agency does not provide sufficient preparation or instructions to the visiting team. 279. The agency's written or consultative guidance to institutions before a site visit is inadequate or nonexistent. 559. Information about the agency's method or effectiveness in assessing the reliability or validity of its standards is missing or inconclusive.
Responsiveness	
280. The agency takes into account the interests and rights of some or all of the following constituencies: students, public, faculty, institutions or programs, and occupational, professional and academic fields.	327. The agency does not provide for or currently have public representatives on its policy/decision-making body.

TABLE 20
(Cont'd)

Statements Characteristic of the Horizontal Dimension
of Figure 4

Characteristics of the Left End	Characteristics of the Right End
Responsiveness (cont'd)	
283. The agency has public representatives on its policy-making bodies.	707. One or more constituencies are omitted or underrepresented on the agency's policy/decision-making body; or representation is otherwise restricted, such as geographically.
320. Advisory councils, consultative bodies or agency committees have public representatives or otherwise take the public interest into account.	
380. Standards are not revised until after interested groups have had an opportunity to react to the proposed revisions.	
700. All significant, interested groups are represented on the agency's policy-making body.	
Fairness, impartiality	
411. The agency's standards are clear and detailed enough to assure fair and reliable treatment to institutions or programs.	610. Some doubt exists as to whether the agency ensures impartial and objective evaluations and decisions.
460. Accreditation is withdrawn only after due process, for cause, and with due notice.	
590. The agency's published procedures are fairly applied; its actions are consistent with its procedures.	
591. The agency's decisions reflect fair and consistent application of its standards.	

TABLE 20
(Cont'd)

Statements Characteristic of the Horizontal Dimension
of Figure 4

Characteristics of the Left End

Fairness, impartiality (cont'd)

710. The agency performs no function that interferes with the exercise of independent judgment about the educational quality of an institution.

743. Members of the decision-making body do not participate in discussions or decisions affecting institutions with which they are affiliated.

Other statements, in addition to those shown in Table 20, contributed to an agency's placement on the horizontal dimension. The 20 statements listed are those that give the most coherent description of the differences associated with that dimension. They are quite similar in their references to evaluative procedures, responsiveness, and fairness to the MDS dimensions described in Chapter V. In addition, the agencies to the right accredited fewer than 25 programs or institutions, while the agencies to the left tended to accredit more than 50.

The vertical dimension of Figure 4 separated recognized agencies from those denied recognition, but not as strongly as did the horizontal dimension. The agencies at the top were small, accrediting fewer than 25 programs, tended to operate with budgets under $25,000, and prompted doubts about the adequacy of their staffs. Their strengths were in having clear organizational structures and published purposes and standards. Some procedural weaknesses appeared, such as weak procedures for handling complaints, for the review and revision of standards, and for the initiation of applications for accreditation. These weaknesses are not as serious as those of the horizontal dimension and do not form as coherent a group of statements.

Agencies toward the low end of the vertical dimension tended to be large, accrediting more than 50 programs or institutions. They were adequately financed and likely to have more than 20 years of experience as an accrediting agency. The dominant aspects of the vertical dimension were therefore size, wealth, and experience.

The horizontal dimension, which most clearly discriminated between denied and recognized agencies, incorporated substantive issues such as the strength of the agency's evaluation procedures and the impartiality of its actions. The vertical dimension reflected other qualities--limitations of size, wealth, and experience--that might not in themselves have led to denial of recognition but could reasonably be expected to be weakly associated with those decisions. That was the case.

The third dimension, not shown, represented less clearcut distinctions among agencies. Like the horizontal dimension, it was related to the representation on the governing board of all constituencies and the general public. It also reflected additional scattered attributes, both positive and negative, at either end. It did not discriminate among different recognition decisions.

The Scope of the MDS Dimensions

A desirable quality of the information in Figure 4, which would contribute to the validity of the recognition process by demonstrating sufficient scope in the information on which decisions rest, would be the representation of all the criteria in the statements that define the two discriminating dimensions. A total of 85 statements discriminated among agencies along one or the other of the two dimensions. These statements were associated with all but 7 of the 44 criteria. Those 7 require that the agency's standards be published (b2iiA); that the visiting team meet with students, faculty, and staff (b3ii); that the institution or program be given a copy of the visiting team's report (b3iii); that the chief executive officer have an opportunity to respond to the report (b3iv); that specific reasons be given for adverse decisions (b3vii); that accreditation not be changed during an appeal (b3viiiA); and that the chief executive officer be given a written statement of the appeal decision (b3viiiC). The failure of these seven criteria to discriminate among agencies was probably due to the low number of agencies that failed to meet them. Deficiencies were found in about 10 percent of the agencies with respect to the criteria dealing with the meeting of visiting teams with all campus groups, and the submission of the visiting team's report to the institution or program. Deficiencies in the other five criteria were found in from 4 to 7 percent of the agencies. The favorable statements related to these seven criteria tended, correspondingly, to be quite frequent. With little variation, they could not discriminate clearly among agencies. That does not discredit their value but only reflects the fact that most agencies met them without difficulty.

The representation of 37 of the 44 criteria on the two dimensions along which agencies were discriminated may or may not be considered adequate. Some may hold that all 44 should contribute. Failure to discriminate, however, does not represent a failure to contribute if, as was the case, almost all agencies met the nondiscriminating criteria. The 37 criteria associated with the two dimensions of Figure 4 provide a moderately good representation of the 44 criteria in the information on which decisions are based. Further, the decisions were not dominated by a few overpowering criteria. Although some criteria were more influential than others--those concerned with evaluative procedures, responsiveness to various publics, and integrity--almost all criteria entered into the actual decisions to some extent.

Overall, the pattern of decisions shown in Figure 4 indicates reliability in the clear separation of agencies about which different recognition decisions were made. Validity in the recognition process is indicated by the nature of the agency characteristics associated with their location in the figure. The two dimensions, particularly the first, distinguish appropriately between agencies recognized and denied recognition.

IMPORTANCE OF THE DISCRIMINATING STATEMENTS

Another kind of evidence that contributes to validity can be derived from Figure 4 and from the judgments of importance of various attributes to an agency's effectiveness in determining educational quality. Confidence in the inferences drawn from recognition would be strengthened if the qualities that most sharply discrimirated the denied from the recognized agencies were also among the most important qualities.

Of the 20 statements in Table 20 that contributed most to the discrimination of agencies along the horizontal dimension, 13 were included in the questionnaires on importance. Ten of those 13 were in the top half with respect to judgments of importance. The discriminating statements that were low in importance were those related to the representation of the general public and other constituencies on agencies' governing bodies. Including public representatives in an agency's policy or decision-making body was ranked 70th among the 80 characteristics judged for importance by agency directors. Even among the other judges, who represented a wide variety of viewpoints, that characteristic ranked 42nd in importance among 54.

While public representatives on governing boards was widely considered of only moderate importance, having representatives of all significant constituencies of the agency on the board might be expected to attract more interest. It did, but barely, ranking 67th among the 80 statements judged by the agency directors. It was not among the statements judged by the other groups.

The direct representation of all interested groups on governing boards of agencies was not considered critical, but making the agencies' policies and procedures publicly accessible was. The characteristic considered of highest importance by both the agency directors and the other groups of judges was that the agency's standards be published. Other statements to assure that governing boards would be attentive to the interests of various constituencies were also high in importance. That faculty members and members of appropriate occupational and professional fields have access to the agency were two attributes considered highly important, but the inclusion of student views in the accrediting process was considered somewhat less important. The statement related to the solicitation of student views ranked in the middle in importance.

Thus the presence of representatives of the general public on governing boards is a characteristic of accrediting agencies that contributes substantially to recognition decisions even though several groups of knowledgeable persons judged it as comparatively low in importance. In the judgment of many informed persons, the comparatively influential role of that attribute in recognition decisions reduces the validity of the recognition process. The pertinent criterion is b2i, which states, "The agency or association includes representatives of the public in its policy and decision-making bodies, or in an advisory or consultative capacity that assures attention by the policy and decision-making bodies." None of the groups of informed persons contributing to the study--agency directors, administrators and faculty members experienced with accrediting, federal and state officials, critics and scholars of accrediting--thought that that attribute contributed greatly to an agency's effectiveness in determining educational quality.

Despite the questions raised about the effect of the criterion related to public representation on governing boards, the decisions generally reflected the criteria considered most important. Thus denial of recognition did indicate deficiencies that most informed observers agreed detracted in important ways from an agency's effectiveness.

SIMULATED RECOGNITION DECISIONS

The first evidence of validity described above consisted of the degree to which agencies receiving different recognition decisions could be discriminated with respect to two dimensions that reflected most of the recognition criteria. The second kind of evidence consisted of expert judgments of the importance of the qualities that differentiated recognized agencies from those denied recognition. In general, the discriminating qualities were those judged highest in importance. A third approach to the validity of a process intended to discriminate more effective from less effective agencies is to compare the results of the actual process with an independent process designed for the same purpose. Since carrying out a full alternative recognition process was not feasible, a simulation was planned that would ask expert judges to make their own recognition decisions about fictitious agencies that matched real agencies in critical characteristics.

Each of 12 fictitious agencies was described in several paragraphs that included from 20 to 27 statements drawn from the list of statements appearing in DEAE staff reports. Statements were combined that were characteristic of agencies denied recognition or awarded recognition for periods of from one to four years. Thus a description made up of 25 statements plus connecting phrases might have included 8 to 12 statements characteristic of agencies recognized for two years, plus 13 to 17 additional statements not associated with any particular decision. The 25 statements constituted a realistic, coherent description of an accrediting or state approval agency recognized for a two-year period. For each decision except recognition for four years, two composite descriptions were constructed from the discriminating statements, and from enough other statements applicable to any of the groups, to round out a realistic agency description. Four composites were formed of agencies recognized for four years, making a total of 12 detailed descriptions of fictitious agencies. Each agency was described entirely by statements that were characteristic of agencies awarded a particular decision or were equally characteristic of agencies of any recognition status.

The 12 composite agency descriptions were examined by expert judges who then made their own decisions about whether the agency should be recognized as a reliable authority with respect to educational quality and whether any doubts about the agency existed that should limit the period of recognition to permit an early review. Thus USOE's recognition process was simulated by an independent process undertaken by informed persons.

About half of those other than agency directors who had been asked earlier to judge the importance of accrediting agency characteristics were asked to participate in the simulation of the recognition decisions. They were supplemented by directors and commission members of accrediting agencies. A total of 151 persons--school and college faculty members and administrators, federal and state officials concerned with accrediting, scholars and critics of accrediting, as well as agency directors and commissioners--were asked to make recognition judgments about the fictitious agencies. A total of 114--75 percent of those asked--responded, including from 60 to 91 percent of the different groups. Although the individual groups were too small to treat separately, the largest consisting of only 23 people, the 114 persons who provided their judgments varied widely, with each one knowledgeable about accrediting from a particular perspective. The faculty members and administrators were from large and small institutions, public and private, degree and nondegree. The agency directors were from regional and specialized agencies, large and small, institutional and programmatic. The government officials, scholars, and critics also viewed accrediting and recognition from equally varied frames of reference.

The results of the simulated decisions are shown in Table 21. The full questionnaire with the 12 fictitious agencies appears as Appendix G. For eight of the fictitious agencies, the consensus of

TABLE 21

Simulated Recognition Decisions

	Fictitious Agency	Decision				
		4 yrs	3 yrs	2 yrs	1 yr	Denied
1.	The Advisory Board on Ophthalmology	14	(51)	23	8	4
2.	The American Council on Internal Medicine	71	17	⑩	1	2
3.	The American Council of Registered Tax Consultants	6	17	40	㉘	10
4.	The American Federation of Speech Pathologists	25	㊻	21	6	2
5.	The Association for the Advancement of Automobile Technology	3	10	41	㉛	15
6.	The Association of Campuses Without Walls	1	0	4	5	(90)
7.	Committee on Research in Medical Technology	(75)	12	4	4	4
8.	The Council on Corporate Administration	46	25	⑰	3	4
9.	The National Association of Counselors for the Elderly	1	0	1	8	(90)
10.	The Paramedical Society of America	㊽	29	8	1	3
11.	Regional Schools Accrediting Agency	(69)	19	8	1	3
12.	Schools of Computer Science Advisory Council	(59)	20	12	4	4

Note: Figures are percentages based on 114 judges. The actual decisions for the agencies from which the composite descriptions were drawn are circled.

the judges' decisions coincided with the actual decisions. For two of the other four, the judges' consensus was recognition for two years while the actual decision had been recognition for one year. The judges awarded recognition for four years to the final two agencies; the actual decision in both cases had been recognition for two years. In each of the four cases where the judges disagreed with the actual decision, their judgment was more lenient.

The easiest decisions--those on which agreement was highest, both among the judges as a group and between the judges and the actual decisions--were those for denial. The inadequate agencies stood out sharply from the others in this simulation of the recognition process just as they did in the multidimensional scaling analyses of actual decisions. The next easiest decisions, as would be expected, were recognition for the full four years. The most ambiguous were the intermediate decisions--recognition limited to from one to three years.

Agreement of Judges with Actual Decisions

A measure of agreement between two sets of judgments that classify objects into categories that have an inherent order, such as the five kinds of recognition decisions, is gamma (Goodman & Kruskal, 1954). Its range is from -1 to +1, with a value of zero indicating no association between the two sets of ordered judgments. Gamma was calculated for the association between the modal decision of the judges and the actual decision for all 12 fictitious agencies as a group. The calculated value of .68 indicates that if a pair of agencies having different actual decisions were selected at random, the probability that the judges' decisions would place the two agencies in the same relative order as their actual decision is greater by .68 than the probability that the judges' order would be the reverse of the actual order. While this gives a quantitative measure to the degree of association between the judges' decisions and the actual decisions, the most informative indication of that association is in the 12 distributions of judgments shown in Table 21. Two of the 12 were off the mark; the other 10 were quite close. The percentages of Table 21 show the frequency with which the Advisory Committee's decisions would be supported by a fairly large, highly diverse group of people who are knowledgeable about accrediting.

Having made a recognition decision about an agency, the judges then indicated the five characteristics that were most influential in their decisions. Tallies of the characteristics that were most frequently judged as influential showed that concerns for fairness or impartiality predominated as controlling factors in the decisions. The six statements listed below appeared a total of ten times in the descriptions of fictitious agencies. Nine of those ten times they were judged among the five most influential statements by at least half of the judges. The median value, over all ten appearances of the statements below, for the percentage of judges who placed them among the most important characteristics, was 66 percent.

The first four of the characteristics listed below were influential in decisions to recognize an agency for three or four years. The last two were influential in decisions to deny recognition or limit the period of recognition to two years or less. All six statements are related to fairness, impartiality, or autonomy.

594. Clearly established procedures ensure impartial evaluations and judgments.

411. The agency's standards are clear and detailed enough to assure fair and reliable treatment to institutions or programs.

590. The agency's published procedures are fairly applied; its actions are consistent with its procedures.

710. The agency performs no function inconsistent with the exercise of independent judgment about the educational quality of an institution.

729. The agency's relationship with its parent organization raises questions of autonomy.

610. Some doubt exists as to whether the agency ensures impartial and objective evaluations and decisions.

Six of the twelve descriptions of fictitious agencies included a statement about the adequacy of its staff, twice in favorable terms and four times in unfavorable ones. Those statements were judged to be among the five most influential by from 15 to 69 percent of the judges, with a median value of 57 percent. Thus they tended to be considered among the most important by a majority of the judges.

Several statements about the agency's procedures for evaluating or improving its standards appeared 11 times, 8 times in a positive sense among agencies recommended for three- or four-year recognition decisions and three times in a negative sense, indicating a deficiency in that area, among agencies recommended for denial or for a one- or two-year period of recognition. These statements were considered among the five most influential by from 21 to 68 percent of the judges, with a median of 43 percent.

The characteristic most consistently judged as influential in unfavorable decisions was a deficiency in an agency's self-study procedures. Although that statement appeared in only two of the descriptions, it was both times the one most frequently judged among the five most influential--by 81 and 72 percent of the judges, respectively.

Statements that appeared frequently in the twelve descriptions, but that were notably infrequent among the most influential five, dealt with the monitoring of ethical practices and broad representation on the governing board. The median frequency of appearance of those two types of statements among the five most influential in any decision was, respectively, 14 and 24 percent. The range was 3 to 32 percent for the monitoring of ethical practices in recruiting, advertising, tuition refunds, placement, and nondiscriminatory practices in admissions. For broad representation on the governing board, including a concern for public representatives, the range was from 11 to 47 percent among the five most influential agency attributes.

Every statement among the 285 used to describe the 12 agencies, even those as innocuous as, "The agency is applying for renewal of recognition," or "The agency approves programs throughout the United States," was judged among the five most influential by at least one person. Yet only half of the 285 statements were placed in the five most influential by more than 15 percent of the judges. The median values of 66, 57, and 43 percent for statements related, respectively, to fairness, adequacy of the staff, and evaluation and improvement of standards are therefore noteworthy. Those three areas and deficient self-studies were clearly the dominant considerations in the decisions reached by the group of judges.

CONFERENCE ON RECOGNITION CRITERIA

The results of the simulated recognition decisions were discussed and expanded at a one-and-a-half-day conference by 44 of the persons who had participated in the simulated decisions. The 44 participants included all the varied points of view that were represented in the 151 persons who had contributed their judgments in the simulation process. Alternately in small groups and in the total group, the assembled persons examined in free-flowing discussions why some agency attributes were critical and others less so in deciding on the merits of an agency's judgments of educational quality. The diversity of the group ensured the airing of divergent points of view. The small number of representatives of any particular group, though, prevented the different views from being attributable to any identifiable group. The diversity of opinion in the group was indicated by one person's view that the Office of Education should have no interest in an agency's evaluation of the validity and reliability of its standards and another person's view that all the other criteria could be abandoned if that one were accurately applied.

An agency's integrity, its evaluation of educational outcomes, and the balance between generality and specificity in the criteria were the three themes that dominated the discussions. One of the small groups gave all its attention to issues of integrity, having decided that every group into which the criteria were organized was related in some way to integrity. They also agreed, as did the group at large, that integrity is important in determining educational quality, that without demonstrable integrity an agency can have little credibility as an evaluator of educational quality. The general importance given by the conference participants to integrity reflects the frequency with which attributes related to integrity--impartiality, fairness, and independence of judgment--were considered the influential determinants in the simulated recognition decisions.

Integrity

An important element seen to contribute to an agency's integrity was the independence or autonomy of its decision-making or governing body. Ties to other organizations or to the institutions or programs accredited should not introduce the possibility of conflicts of interest or interfere with the fair application of the agency's standards. Public representation on the governing body can help assure autonomy and independence of judgment by providing that body with an independent viewpoint. Public representation also gives a voice to consumer interests that might not otherwise be heard. The conference participants thus gave greater importance to public representation than did the total group or the agency directors in responding to the questionnaires on importance.

Whether the protection of consumer or public interests falls properly within OE's concern for the reliable determination of educational quality was disputed by some, who held that public interests were protected by other federal agencies. OE, in their view, should not enter that field. Thus the degree of participant agreement shifted as issues were defined more narrowly, illustrating the importance of the specificity with which criteria are stated. Integrity in a broad sense was widely accepted as of high importance and pertinent to the determination of educational quality. But if integrity is construed to include the autonomy of the decision-making body, some consensus is lost. And if autonomy requires the presence of public representatives on the agency's governing body, the level of agreement shrinks further.

Ethical practice by the agency and the attention of the agency to the ethical practices of its accredited institutions or programs is related to integrity but is not synonymous with it. Some participants held that agencies should closely monitor the ethical practices of their institutions or programs in areas such as advertising, fee structures, the content of bulletins and other publications, course offerings, and grading practices, and that all those practices directly affect the quality of education provided and are therefore legitimate concerns of OE. Others were equally strong in their contention that many areas of potential unethical practice, however reprehensible those practices may be, are not related to educational quality and are therefore not within OE's area of concern. As with integrity in a broader sense, they believed that other agencies, or the institutions themselves, should monitor the ethical behavior of institutions or programs.

Several reasons were given for the importance of integrity in the recognition of accrediting agencies. Issues related to integrity were described as generally more poorly defined than other accrediting issues, such as standards or procedures. Closer attention to issues of integrity is therefore required. Integrity affects public confidence in the accrediting process and the credibility of accrediting decisions. Finally, because institutions or programs are observed only after fairly long intervals, their integrity must be relied on to assure continuing compliance with accrediting requirements.

Other topics related to integrity were discussed. One, on which competing views were strongly held, involves the availability to the public of visiting team reports. Some participants believed that would often prevent critical material from being included in the reports. Others believed that the content of the reports would not be affected. One participant suggested that those two contradictory beliefs be tested empirically. Compromise positions between those two were also suggested, such as permitting an institution or program to withhold release of the report if it desires.

Release to the public of visiting team reports is one form of public disclosure that some participants thought would increase public confidence in accrediting and would at the same time educate the public as to what they can expect of accreditation. Another form of public disclosure, which some thought should be required and which is not as threatening as the release of reports, is complete disclosure of agency policies, purposes, and procedures.

A final point made in response to a question from one of the participants was that the concentration of one group entirely on integrity did not imply a belief that it was generally lacking. On the contrary, existing agencies were believed to possess it to a high degree. But the public is concerned about issues of ethics and integrity, and the potential for abuse of public confidence in higher education exists.

Performance of Graduates

Monitoring the performance of graduates of the programs or institutions accredited was a second major issue in the conference. Despite Criterion b6, which calls on agencies to require "on-going program(s) of evaluation of outputs," some participants were concerned that present recognition criteria seem not to require that kind of monitoring by the agencies and do not require that institutions' or programs' self-studies provide evidence of student learning. Others held that neither OE nor the accrediting agencies were entitled to look into the educational products of institutions or programs. In their view, accrediting agencies should require that effective educational procedures appropriate to the institution's or program's purposes be followed, and that efforts toward improvement be undertaken. But neither OE nor accrediting agencies are regulating bodies, and institutions or programs must be left free to choose their own procedures as long as they are not inimical to student learning. Thus assessment of the educational product, and the comparisons of educational quality that would follow from that, were contrasted with the view that the educational process alone should be examined.

An intermediate position was taken by some participants who would like to see general requirements established concerning attention to educational outcomes, with the specifics as to the ways they might be met left flexible. An agency petitioning for recognition might be asked to describe policies and procedures that call for accredited institutions or programs to demonstrate some kind of activity directed toward the examination of their educational products. Since the entire purpose of the recognition process is to determine the effectiveness with which educational quality is judged, the absence of a criterion related to the examination of the educational product seems hard to defend. Again, agreement can be reached on general issues; the specifics of their implementation cause trouble.

Specificity versus Generality

The third major issue was whether the OE criteria should be stated as general requirements or should be spelled out in considerable detail. Both views had strong adherents, but the issue itself was hard to be specific about, and some of the disagreement probably could have been resolved in particular instances or through attention to the level of specificity desired. Greater generality in the statement of the criteria gives greater flexibility to the agencies in the ways they meet the criteria. It also, though, allows greater freedom of interpretation to OE, which may lead to disputes with the agencies. Those calling for greater specificity, or at least no retreat from the present level of specificity, were concerned that important considerations, such as those related to consumer protection or ethical practice, might get lost in criteria that were too broadly stated. An intermediate view that many participants found acceptable was a two-level approach. The criteria themselves would be broadly stated requirements. A supplementary handbook or guidebook would then provide specific and varied ways the agencies could meet the general criteria.

Probably few of the participants would advocate an extreme view on either side of the generality-specificity issue. The concern was usually over too much or too little specificity. One group, for example, reported, "Overspecificity disturbed everyone," and another reported, "Almost unanimous concern for overspecificity." Yet neither group favored very general criteria; how much specificity was desirable was the real issue.

Wide agreement was expressed on the importance of the level of specificity in OE's criteria. Wide agreement was also found with respect to some broadly stated criteria, such as the integrity of the agency. But if specificity is increased, opinions will differ as to where that increase in specificity should stop and also as to the kinds of specification added. Agreement on the value of integrity, for example, may not be reduced much by including within its domain a requirement that conflicts of interest in the governing body be avoided. Greater reduction in agreement would probably result if the circumstances that were to be interpreted as conflicts of interest were spelled out. Having members of an agency's decision-making body serve as consultants to programs seeking accreditation, for example, was seen by some participants to constitute a conflict of interest. But only about one person in five among those who completed the questionnaire simulating recognition decisions considered that characteristic to be among the five that most influenced their judgments. Similarly, while the avoidance of conflicts of interest would be accepted by many as an appropriate aspect of integrity for OE's attention, ethical practices in advertising would attract less support.

A major problem with any set of criteria, and one that will no doubt always exist, is finding an appropriate and acceptable degree of specificity in their formulation. This is a problem the present project addressed by organizing elements of the existing criteria into hierarchical groups of increasing breadth or generality. But no lasting solution can be expected. The changing context within which accrediting operates was mentioned by several participants as one reason why criteria can always be expected to shift to some extent. The frequency and extent of those shifts should decline as the focus of attention is moved to higher levels of generality.

The conference participants, in focusing on issues of impartiality, fairness, and other aspects of integrity, reinforced the importance those issues were given in the simulated recognition decisions. Virtually all the agency characteristics most frequently identified as among those influential in the decisions were related to integrity, adequacy of staff, and effectiveness of the evaluation procedures. All these are among the attributes agency directors considered important but difficult to observe. A major step in the improvement of the recognition process would therefore be the development of more refined procedures for observing agencies' effectiveness. Structural or organizational requirements do not present much of a problem; criteria of effectiveness do.

The relationship of the OE criteria and procedures to accrediting agencies is similar to the relationship of the agencies to educational programs and institutions. Agencies do not specify the procedures an institution must follow, although specialized agencies may impose some curricular requirements, and they do not specify the educational results that must be achieved. They do, however, require evidence that the educational program follows generally sound and accepted practices. Similarly, OE does not impose on agencies any requirements as to the educational products they must promote. Yet some set of criteria and procedures to assure that the quality of the educational product is the ultimate concern is necessary. This dilemma between the assurance of quality and respect for the autonomy and integrity of the agencies is a major problem for OE as it is for the agencies in their relations with programs.

SUMMARY

The most direct evidence of the validity of the recognition process was in the judgments of a fairly large number of knowledgeable people, with different kinds of accrediting experience, who were given the critical information on which earlier recognition decisions had been made. Their judgments were closely related to the original decisions. The differences were in the direction of greater leniency in the decisions of the panel of experts than in the actual decisions. The differences also were greatest for the intermediate decisions involving limited recognition rather than outright denial or recognition for the full four years. Thus the actual decisions were clearly supported by an independent panel of experts.

A larger group of judges, including almost 100 accrediting agency directors, agreed remarkably well on the characteristics of accrediting agencies that are most important to the evaluation of educational quality. Although all the criteria are related to qualities judged important, the ones judged most important were those that call for sound evaluative procedures, fair application of standards, and due process. These qualities were also those that most clearly discriminated between agencies recognized for three or four years and those denied recognition or recognized for a more limited period. The exception was the criterion related to public representation on an agency's governing body, which was influential in the decisions but was considered less important than most of the other criteria by the expert judges. The qualities most strongly reflected in the recognition decisions are therefore the qualities widely believed to be most important in the evaluation of educational quality.

The conference participants restored some importance to public representation on an agency's governing body by relating it to integrity, which they considered possibly the single most important general agency quality. In the broader context of agency integrity, public representation gains importance. The value of attention to the relationships among the criteria and their components was thus demonstrated. The context of related criteria in which any given agency attribute is interpreted affects its meaning and its importance.

The conference participants affirmed that view in another way by pointing out the importance of stating criteria at an appropriate level of generality--neither overly broad nor too specific. A criterion too broadly stated allows too much variability in interpretation. Wording that is too specific may leave unstated some important related aspects of agency performance. Making explicit the relationships among criteria will reveal their broader implications, just as the components of a criterion draw some meaning from their relationship to it.

Despite the influential role played in the recognition process by evaluative procedures, fairness, responsiveness, and due process, most of the criteria were represented in the actual decisions. No limited few dominated. Those that did not discriminate among agencies given different recognition decisions were criteria virtually uniformly met by all the agencies that had petitioned for recognition. While these criteria were important, the absence of agencies that failed to meet them kept them from being discriminators.

The accrediting agency directors were asked to evaluate a number of suggestions for revising the criteria. Those results are discussed in Chapter IX. None of the suggested additions to the criteria received any appreciable amount of support. That fact and the wide representation of the present criteria in the decisions indicate that the current recognition process adequately reflects the appropriate qualities of accrediting agencies.

Three sources of evidence--the simulated recognition decisions by a panel of experts, the greater role played in the recognition decisions by the more important agency qualities, and the representation in the recognition decisions of almost all aspects of the criteria--provide support for inferences that accord greater effectiveness in evaluating educational quality to recognized agencies than to agencies denied recognition. While some important qualities are less well defined and therefore probably less well evaluated than others, and while some may be more influential in the decisions than is justified by their importance, a substantial degree of validity can clearly be attached to inferences drawn from the recognition process.

IX. AGENCY VIEWS OF THE RECOGNITION PROCESS

IMPACT OF THE RECOGNITION PROCESS

The executive directors of 33 accrediting agencies visited in March 1978 were asked during interviews to describe changes in the functioning of their agencies during the past ten years. Their descriptive comments were sent to the directors of the 129 identified accrediting and state approval agencies with a request to check which of those changes their agencies had experienced, and to state whether the recognition process had influenced the change. To assess the influence of the two major revisions of the recognition criteria in 1969 and 1974, the directors were also asked to indicate roughly the dates of the changes. Completed questionnaires were returned by 91 agency directors, 71 percent of the total surveyed. The complete results are presented in Appendix D.

Of 43 descriptive statements of changes drawn from the initial interviews of agency heads, 8 were related to standards (formulation, effect on institutions and programs, and changes in content or emphases); 3 with communication between the agency and its constituencies; 4 with organizational shifts; 10 with accrediting procedures; 10 with the way the agency responds to its constituencies; and 8 with growth or development in the agency's capabilities. Table 22 lists the 10 most frequently reported changes, the percentages of agencies in which they had occurred, and the percentages of agency directors who saw the Office of Education as the origin of the changes.

The two most common changes involved evaluative procedures--improved site visits and self-studies. Almost every agency had improved or clarified its self-study procedures, and nine out of ten had done the same with their site visits. With these changes, the evaluative function of the agencies was said to have become clearer. Other procedural changes, reported by at least two-thirds of the directors who responded, made procedures in general more systematic, strengthened the appeals process, increased consultation with institutions or programs, and instituted a continuing review of substantive changes in programs. The directors believed that these improved procedures had increased the credibility of the agencies.

Almost as frequently reported as the improvement in self-studies and site visits were changes that clarified and strengthened the agencies' standards and gave more systematic attention to their validity and reliability. Four other changes in standards that had been mentioned by the interviewed agency directors were not widely confirmed. Of those who responded, only about one director in four stated that accrediting had become more heavy-

TABLE 22

Changes in Accrediting and Approval Practices

Change	Percentages reporting that the change... Occurred	Due to OE	Total OE Effect[a]
29. Procedures for the self-study were improved or clarified.	98	33	32
28. Procedures for on-site visits were improved.	89	24	21
4. The agency became more systematic in its concern for the validity and reliability of its standards.	87	30	26
1. Standards became better defined, more explicit.	86	20	17
27. The agency's procedures became more systematic or standardized.	86	21	18
6. The agency's standards were strengthened.	82	24	20
37. The agency has grown.	79	7	6
16. Procedures for dealing with complaints against institutions were improved.	77	54	42
11. Information sharing with other organizations through conferences, hearings, or workshops was increased.	77	33	25
30. An appeals procedure was instituted or improved.	74	46	34

[a] The total effect of the OE recognition process is the product of the first two columns, or the percentage of agency directors who reported that the change had occurred and that it was a consequence of OE's recognition process.

handed or legalistic. The same proportion thought accrediting now emphasized the identification of weaknesses rather than the encouragement of improvement, and reported that administrators of institutions or programs were more critical of the ways in which accrediting standards were being defined and applied. Nevertheless, one in four of the directors did say that those negative changes had occurred, and one director in ten thought standards were so narrowly defined that important educational issues were being missed.

In short, the agency directors were in strong agreement that standards from 1969-1978 had become better defined, strengthened, and more systematically administered without becoming overly restrictive or punitive. A small minority had some reservations about other changes.

Most of the directors reporting these changes said they had occurred gradually rather than within any defined period of time. Those who placed the changes in a particular time period were most likely to attribute them to the four-year period since 1974. A quarter of the agencies, though, as of late 1978, when the questionnaire was completed, had been operating for only five years or less, so they were not likely to report changes before 1974. In fact, only one of the 43 changes was reported as having occurred more frequently in the 1969-1974 period than in the 1975-1978 period. That change, however, which stated that giving accreditation a role in the determination of eligibility for federal funds had in effect made accreditation mandatory rather than voluntary, was affirmed by only a third of the directors.

Responsiveness was a new rubric for a group of criteria in the 1974 revisions, a fact reflected in the frequent changes reported in that area after 1974. The most frequently reported change in this group was improvement of procedures for dealing with complaints against institutions. This change, and an increase in public representation, both occurred largely after 1974, although a third of the directors said a general responsiveness to public concerns had been increasing continually since 1969. Before 1974, the specific inclusion of public representatives in agency activities had changed only slightly. Improved procedures for dealing with complaints and increased public representation reflected new criteria in the 1974 revisions, and both were said by a majority of those reporting the changes to have been due to OE's actions.

Three additional changes in responsiveness were fairly common. More than half of the directors reported greater attention to non-traditional programs, ethical practices, and the protection of the public against poor educational quality. Opinion was almost evenly divided as to whether these changes had been continuous or had occurred since 1974. A minority cited OE as their impetus.

The substantive changes in accrediting most frequently attributed to the recognition process were the increase in public representation in the agencies' activities, strengthening of the agencies as a result of the self-examination associated with petitioning for recognition, and improvement in dealing with complaints against institutions. Each of these changes was said to have occurred as a result of the recognition process by from 40 to 50 percent of the directors (Table 23). More than half of the agency directors, however, said the burden imposed by OE's recognition criteria had increased since 1969, with almost all of them understandably attributing that change to OE. Improvements in the self-study and appeal procedures, and better communication with federal and state agencies, were attributed to OE by a third of the directors.

In general, then, the agency directors reported an extensive group of changes since 1974 on top of a continuing pattern of growth and change. Most of those changes were seen as related to forces independent of the recognition process, but a third to a half of the directors attributed a small group of changes directly to OE and the recognition process. The most widely reported changes involved improvements in evaluative procedures, strengthening of standards, and responsiveness to concerns of the general public and other constituencies of the accrediting process. While the recognition process undeniably created additional burdens for accrediting agencies, the prevailing view was that the results were valuable.

TABLE 23

Changes Frequently Attributed to OE

Change	Percentages reporting that the change... Occurred	Due to OE	Total OE Effect[a]
14. The burden imposed by OE requirements increased.	58	93	54
18. Public representation was increased.	71	70	50
39. The self-scrutiny required in applying for recognition strengthened the agency.	71	64	45
16. Procedures for dealing with complaints against institutions were improved.	77	54	42
17. The burden of dealing with reactions by institutions, programs, or consumers to OE's requirements increased.	47	77	36
10. The agency became aware of a need for better communication with federal and state agencies.	67	52	35
30. An appeals procedure was instituted or improved.	74	46	34
29. Procedures for the self-study were improved or clarified.	98	33	33

[a] The total effect of the OE recognition process is the product of the first two columns, or the percentage of agency directors who reported that the change had occurred and that it was a consequence of OE's recognition process.

SUGGESTIONS FOR IMPROVING THE RECOGNITION PROCESS

In February 1978, shortly before the visits to a sample of accrediting agencies, early versions of two questionnaires were sent to their directors for review and comment. One was the questionnaire, composed of statements from the DEAE staff reports, that asked for judgments on the importance of various accrediting agency characteristics. The other, containing the same statements, asked for judgments about the ease or difficulty of observing those characteristics.

Twenty-five of the sample of 33 accrediting and state approval agencies had been selected randomly to represent medical and nonmedical agencies, and regional, state, and national agencies. The national agencies were further grouped for sampling into those dealing with programs that were dominantly pre-baccalaureate, baccalaureate, or graduate. Eight additional agencies were included because they represented particular points of view or large numbers of programs. The directors of these agencies were asked to review the two questionnaires and to comment on them and other aspects of the study in interviews to be conducted the following month. Staff members from four regional offices of Educational Testing Service visited each of the selected agencies and reviewed the form and content of the questionnaires with the director. The directors were also asked to comment on the effects of the recognition process on their own agencies and to suggest changes in the process. The suggested changes were later sent to all accrediting agency directors with a request that they indicate their agreement or disagreement. The questionnaire and response distributions of the 94 directors who responded, 73 percent of the total of 129, are presented in Appendix E.

The 55 suggested changes were grouped into six categories. Ten suggestions asked for additional information about the recognition process from DEAE. Twelve were comments abcut perceived inequities or inconsistencies in the recognition process that implied a need for change. An example was the comment, with which about a third of the directors agreed, that DEAE's procedures for due process were inadequate. Another twelve suggestions concerned modifications in DEAE's role or function. Six suggested alternative ways the recognition process might be structured, as, for example, by removing any concern for educational quality from the determination of eligibility for federal funds and leaving financial responsibility and accountability as the only considerations. Finally, nine suggestions recommended additions to the present criteria, and six recommended deletions.

Clearer Direction from DEAE

The ten recommendations for additional information and guidance from DEAE were strongly endorsed by the directors, with from 52 to 82 percent of the directors either strongly agreeing or checking the sixth point on the seven-point scale, which lay between "Agree" and "Strongly Agree." The three most frequently endorsed recommendations--by at least three-fourths of the directors--were that DEAE publish its procedures for evaluating agencies in detail, specify the kinds of evidence acceptable for meeting each criterion, and provide agencies with a copy of the staff report prepared for the Advisory Committee. At least 40 percent of the directors gave ratings of 6 or 7 to the other recommendations that called for additional information or DEAE guidelines for agencies. These included more explicit definitions of some of the criteria, more detailed information about the reasons for the recognition decisions, and the provision of more information about the recognition process through publication of the responsibilities of DEAE and the Advisory Committee, the criteria and procedures for selecting Advisory Committee members, and the effects on an agency of different recognition decisions. These and the suggestions in other groups for which the difference between the ratings of 6 or 7 and the ratings of 1 and 2 were greater than 50 percent are shown in Table 24.

The responses to these recommendations strongly indicated a need for additional guidance to institutions and programs as well as for more detailed information about DEAE procedures for evaluating agencies. The keen interest shown by agency directors in additional and more detailed information was reinforced by the fact that even the least strongly supported statement in this section--calling for greater clarity in the wording of the recognition criteria--was given a rating of 6 or 7 by 42 percent of the directors. That and the other two recommendations in this group that were least strongly endorsed--for improved directions for preparing petitions, and for a timetable for the submission of supporting materials--constituted clear examples of the kind of additional information agencies wanted from DEAE. This concern of the agency directors had been anticipated by DEAE. A guidebook, which constitutes Part III of this report, specifies the kinds of evidence petitioning agencies might present to DEAE to satisfy each criterion for recognition as well as procedures for petitioning for recognition.

TABLE 24

Suggestions Receiving Strong Support

Suggestion	Percentages of two highest ratings minus two lowest
3. DEAE should provide agencies with a copy of the review summary presented by its staff to the Advisory Committee.	82
8. DEAE should specify the kinds of evidence it considers acceptable for meeting each criterion.	77
1. The Division of Eligibility and Agency Evaluation (DEAE) of the U.S. Office of Education (OE) should publish in detail its procedures for the evaluation of agencies.	76

TABLE 24
(cont'd)

Suggestions Receiving Strong Support

Suggestion	Percentages of two highest ratings minus two lowest
31. Institutions receiving federal funds should be held legally accountable for the honesty and accuracy of the information they publish and disseminate about their educational programs and financial status.	67
5. The responsibilities of DEAE and of the OE Advisory Committee should be published.	65
4. Procedures and criteria for selection of OE Advisory Committee members should be published.	61
20. An accrediting agency staff member should be present at the time of the agency's review by the Advisory Committee.	60
9. The commissioner's report should provide more detailed feedback on the reasons for the recognition decision.	56
25. DEAE should hold open meetings to give agencies an opportunity to provide input on policy changes.	55
17. Hearing procedures for agencies should be structured to ensure that appropriate issues are covered.	55
7. A timetable for submitting materials to DEAE should be provided to agencies.	51
2. DEAE should provide more information on how an agency will be affected by a particular recognition decision.	51

Inequities or Inconsistencies in Recognition

The most frequently endorsed comments on inequities or inconsistencies, with a half or more of the directors indicating strong agreement (ratings of 6 or 7) and no more than three or four indicating strong disagreement (ratings of 1 or 2), were the following (paraphrased):

20. An agency staff member should be present during the Advisory Committee review.

17. Hearing procedures should ensure attention to appropriate issues.

19. The Advisory Committee should read the petitions as well as the DEAE staff reports.

14. DEAE should meet the same criteria the agencies meet.

The first three recommendations indicated a fear that unfavorable decisions may be reached on the basis of incomplete or erroneous information. The need for specific procedures to prevent and redress such decisions was implied. The fourth is a broader concern, which suggests that DEAE be concerned with issues of responsiveness, evaluation, standards, due process, integrity, and organizational structure to the same extent that it places those requirements on agencies. The fear that bad decisions may result from bad information can be reduced in several ways other than by the specific suggestions cited above. At present, for example, agency staff members do have an opportunity to present information directly to the Advisory Committee and may be present during the

Committee's deliberations. The issue in general is a defensible one, however, and deserves attention in any restructuring of DEAE's procedures.

Most of the other comments in this group described issues about which large proportions of the directors had no opinion. Yet appreciable minorities, on the order of 20 to 30 percent, were critical of the recognition process in various ways, feeling, for example, that large, powerful agencies got preferential treatment (number 12), that the interpretation of the criteria was inconsistent from year to year (number 13), and that DEAE's procedures to assure due process were inadequate (number 15).

DEAE Functions

Among the suggestions related to the role or functions of the Office of Education, the two endorsed far more strongly than any others were, first, that institutions receiving federal funds be held legally accountable for the accuracy of the information they provide about their educational programs and financial status, and second, that DEAE hold open hearings on policy changes. Two other suggestions also received strong support. One was that a variety of information about particular institutions and programs--changes in eligibility, actions of the FTC and the courts, and accreditation or approval actions--be more widely published. The other was that the extent to which the practices of programs and institutions were ethical should be a concern of the Office of Education in determining eligibility for federal funds.

Some other suggestions in this group are notable because of the absence of any clear consensus. For example, the use of recognition criteria to promote experimentation received only lukewarm support. And the recognition of more than one agency operating in a particular educational area was viewed more negatively than positively, but not by a great margin.

Restructuring the Recognition Process

Only one of the six suggestions for restructuring the recognition process received much support. It called for the establishment of an appeal body to which agencies denied recognition could have recourse. About a third of the directors gave this suggestion judgments of 6 or 7, while 7 percent strongly rejected it. A suggestion that eligibility for federal funds not involve standards of educational quality was overwhelmingly rejected. Only 12 percent of the directors gave it even slight endorsement, while 81 percent rejected it. Two suggestions in this group are notable in the virtually even spread of opinion from one extreme to the other. One was that the responsibility for recognition be delegated to an independent body, such as the Council on Postsecondary Accreditation. The other suggestion was similar, calling for the review of an agency's operations to be carried out by an independent body.

About 80 percent of the directors expressed an opinion on each of these, and on each, any sizable group that expressed strong agreement was matched by an equally sizable group that expressed strong disagreement.

Changes in the Criteria

None of the suggested additions to the criteria was endorsed by the directors, and only one suggested deletion received even moderate endorsement. About half of the directors agreed somewhat, and about a quarter agreed strongly, that the criterion calling for agencies to be concerned with the affirmative action policies of its programs or institutions be abandoned. (Although the relevant criterion calls for agencies to foster nondiscriminatory practices, some directors have interpreted this to include affirmative action as well.) The deletion of several other criteria had been suggested, but none was supported for deletion by more than about a third of the directors, and in every case more directors favored retention than deletion. These included the criteria related to filling an identifiable need, requiring public representatives on the decision-making bodies, having a visiting team member present at the evaluation of the visiting team report, fostering ethical practices, and encouraging innovation.

Only one suggested addition received even slight support--the establishing of special procedures for evaluating off-campus programs. Although more than a half of the directors either expressed no opinion or took a middle view of that suggestion, slightly more directors favored than rejected it. Certifying site-visit reports, conducting surprise audits, and gathering specific information about the integrity of chief executive officers were all strongly rejected.

Responses to the Suggestions

The main thrust of the directors' recommendations was toward a freer flow of information about the recognition process. Of the 12 most strongly endorsed suggestions, listed in Table 24, all but one involve the flow of information, particularly about the mechanics of the recognition process--how the information that reaches the Advisory Committee influences its decision about an agency, and the reasons for its decision. The one suggestion in Table 24 not related to the flow of information called for institutions to be held legally accountable for the accuracy of the information they publish.

The annually published list of nationally recognized accrediting agencies and associations includes some of the information desired by the directors. The responsibilities of DEAE and the Advisory Committee, for example, are listed in it each year. Thus suggestion number 5 (Table 24), endorsed by almost all the directors, has been met. In other cases, though, the desired information is skimpy at best. For example, a one-sentence paragraph in the annual publication of recognized agencies tells an agency where to write for information about becoming listed by the Commissioner. It could as easily provide brief information about the petitioning, evaluation, and decision process that precedes the listing.

As was mentioned earlier in this chapter, a set of guidelines has been prepared that specify the kinds of information agencies may submit as evidence of satisfaction of the various criteria, and the procedures to be followed in petitioning for recognition. Numbers 8 and 6 among the suggestions in Table 24, calling for the specification of acceptable kinds of evidence and directions for preparing petitions, are therefore being met. Other informational needs could be met more fully if more detailed descriptions of the mechanics of the decision process, the selection of Advisory Committee members, and other details of recognition were published.

Some of the suggestions in other areas are being met with current procedures. Open meetings on policy changes, for example, have been held intermittently since DEAE was established in 1968. The strong endorsement of this practice, as indicated by the directors' response to number 25 among the suggestions, indicates that that practice should continue.

SUMMARY

The two kinds of information described above--changes that have occurred in accrediting during the past ten years and changes in the recognition process that agency directors would like--show a substantial strengthening of accrediting and general satisfaction with recognition. Accrediting has been improved primarily through more effective use of the self-study and site visit in evaluations and through greater concern that accrediting be responsive to the interests of its various constituencies, including the general public. The care and attention given the formulation and maintenance of accrediting standards also has increased. Most of these changes have been seen as natural developments of the accrediting process, but OE's criteria for recognition have been given credit by appreciable numbers of accrediting directors--from a third to a half of a highly representative sample--for the increased responsiveness and for some of the improvement in procedures.

Despite some occasional sense of irritation at the increased burden the recognition process imposes on accrediting agencies, their directors were generally satisfied with the criteria and their application. No suggestions for substantive changes in the criteria received appreciable support, although several of the existing criteria judged to be less important than most--those concerning public representation on governing boards, ethical practices, having a member of the visiting team present at the evaluation of its report, and encouraging innovation--would not be missed if they were abandoned.

The most frequently recommended changes in the recognition process called for some form of improvement in the flow of information between DEAE and the agencies. Related to that concern was a desire for procedures that would minimize the intrusion of misinformation into recognition decisions, and for an appeal process that would counter the effects of erroneous information or flawed decisions. The general structure and functioning of the recognition process have been well accepted. Adjustment of some of its details, however, was judged to be desirable.

X. DIFFERENTIAL WEIGHTING OF CRITERIA

The published criteria (Appendix A) on which recognition of accrediting agencies is based are organized into a hierarchical pattern consisting of four broad areas, 19 subareas, and 24 more specific criteria, some of which are subdivided further to produce a total of 44 criteria. Yet the scope of the various areas, subareas, and criteria do not always match their hierarchical position. Some subareas seem broader and more important than some areas, while other subareas are less important than some of the criteria. For example, the fourth major area involves agency autonomy in forming independent judgments and guarding against conflicts of interest. In contrast, a subarea of another major area includes the requirements that accredited institutions meet established standards, that policies and procedures be fairly applied, and that decisions be objective and impartial. Apart from the apparent overlap in these two criteria, the scope and importance of the second seem at least as great as the first, which nevertheless stands in a higher position hierarchically. Similarly, Criterion b7, which calls for the encouragement of experimentation and innovation, is hierarchically above but less important than Criterion b3viii, which is concerned with the establishment of procedures for appeals.

The recognition decision, which consists only of classifying an agency as having been denied recognition or granted it for from one to four years, is intended to reflect the quality of an accrediting agency in terms of all 44 of the criteria and the broader subareas and areas into which they are organized. That hierarchical structure, however, because it is not always consistent with actual differences in the scope and importance of the characteristics included, may not help the Advisory Committee reach a decision. In arriving at their recommendation to the Commissioner, the Committee weighs an agency's weaknesses against its strengths, assessing the seriousness of the deficiencies and the likelihood that they will be corrected within a reasonable period of time. In effect, the Committee implicitly gives greater weight to some criteria, probably without regard to their hierarchical position, and it may even vary the weight of one criterion, quite properly and appropriately, depending on the agency's performance on some other criterion. Questions about an agency's autonomy, for example, may not count as heavily against an agency with well-defined procedures for guarding against unfair or biased decisions as against another agency deficient in the second area as well as the first. Also, agencies with the same number of deficiencies may properly receive different decisions because of their different patterns of deficiencies.

Such a process of informal and perhaps unexpressed weights may lead, because of uneasiness over its lack of system or specificity, to efforts to formalize and standardize the process by specifying fixed weights to be applied to each criterion. A system of carefully established weights has intuitive appeal, particularly when many considerations, varying in importance, enter into the decision. The more important criteria should, presumably, carry greater weight. Some justification can also be found, however, for giving greater weight to the more reliably observed criteria (Fitzpatrick & Morrison, 1971). As important as some quality may be, if it cannot be reliably observed, giving it much weight in the decicion seems unwise. The following discussion therefore covers fixed weighting schemes based on importance, on reliability, and on both combined.

CALCULATION OF WEIGHTS

Studies of the use of weights in decision processes have usually been directed toward the improvement of predictions. In hiring life insurance salesmen, for example, years of prior sales experience, years of postsecondary education, scores on a test of general intelligence, and scores on a personality inventory related to salesmanship might all be considered important in selecting the most promising applicants. The relative weights of those predictors of performance can be determined by finding the combination that shows the highest relationship with later sales records. In most applications of weights, some such accepted criterion is available to permit the calculation of an optimal set of weights. Those weights are then used in future selection decisions on the assumption that the predictive relationships had remained unchanged.

The recognition process, however, has no obvious standard of merit for accrediting agencies. As a consequence, no set of weights for the various recognition criteria can be established that would be based on an acceptable predicted standard of performance. While the relationships of the criteria to past recognition decisions can be calculated, they would only indicate how the criteria had been informally weighted in the past, not what their weights should be. In the absence of a standard of accrediting agency performance, illustrative sets of weights were developed from the agency directors' judgments of importance and reliability.

As reported in Chapter VI, agency directors and a variety of other knowledgeable persons judged the importance of a number of characteristics to an agency's ability to evaluate educational quality. Each characteristic was associated with at least one of the recognition criteria. The average importance of the statements directly associated with each criterion provided an overall judgment of the importance of the criterion. Values of statements that were not direct derivatives of the published criterion were not included in its average value, even though they were usually pertinent to it. For example, Criterion b8 specifically requires that accredited institutions meet published standards, that the standards and procedures be fairly applied, and that decisions be reached impartially and objectively. The importance of statements embodying these three elements of the criterion were averaged for its overall importance. Excluded were other statements related to the criterion but not an explicit part of it, such as, "The agency monitors continuing compliance with standards through the submission of regular reports." The judgments of importance from which weights were derived for each criterion (Table 25) therefore referred to the criteria in a narrow and somewhat literal sense. They did not incorporate broader implications of the criteria that occasionally appeared in the descriptive statements, nor did they apply to the statements themselves except when a single statement happened to be a direct restatement of the criterion.

In the early planning of the study, variations among different groups of judges in the importance assigned to various criteria were expected to lead to several sets of weights--different weights for groups viewing accrediting from different perspectives. The high degree of agreement across the various groups of judges reported in Chapter VI made that unnecessary. The weights in Table 25, for importance as well as observability, were therefore derived from the judgments of the agency directors.

TABLE 25

Comparative Weights of Criteria

	Criterion	Weight due to importance[a]	Weight due to observability[b]	Weight due to both[c]
b3iii	Written report is provided.	9.60 (3)[d]	9.32 (3)	9.46 (3)
b3ii	Visiting team meets all groups.	9.60 (3)	8.66 (3)	8.79 (3)
a3iii	Self-study is required.	9.60 (3)	8.52 (3)	8.65 (3)
b2iiA	Standards are published.	9.50 (3)	9.32 (3)	9.36 (3)
b3vii	Adverse decisions may be appealed.	9.50 (3)	--	--
b3vi	Accreditation is withdrawn only for cause.	9.40 (3)	8.76 (3)	8.71 (3)
b9	Reevaluation occurs at reasonable intervals.	9.40 (3)	8.62 (3)	8.57 (3)
a3iiiB	Guidance is given for self-study and visit.	9.30 (3)	--	--
b8	Standards are fairly applied, decisions impartial.	9.12 (3)	6.24 (2)	6.02 (2)
a2i	Staff and procedures are adequate.	8.90 (3)	6.24 (2)	5.87 (2)
b3iv	CEO may respond to the report.	8.70 (3)	9.39 (3)	8.64 (3)
a3i	Definitions and procedures are clear.	8.35 (3)	8.83 (3)	7.79 (3)
b3viiiC	CEO is given specifics of appeal decision.	8.30 (3)	9.11 (3)	7.99 (3)

TABLE 25
(cont'd)

Comparative Weights of Criteria

	Criterion	Weight due to Importance[a]	Weight due to Observability[b]	Weight due to Both[c]
d1	Independence of judgments is protected.	8.20 (3)	6.28 (2)	5.44 (2)
b2iii	Notice is given prior to revision of standards.	8.10 (3)	8.62 (3)	7.38 (3)
a2ii	Financial resources are adequate.	7.95 (3)	6.90 (2)	5.80 (2)
d2	Conflicts of interest are avoided.	7.80 (3)	7.99 (2)	6.59 (3)
b3viii	Appeal procedures are published.	7.80 (3)	--	--
b1ii	Purposes are clear.	7.50 (2)	9.32 (3)	7.39 (3)
b3viiiB	Hearing before appeal body is provided.	7.50 (2)	9.11 (3)	7.22 (3)
b3viiiA	Status is not changed during appeal.	7.40 (2)	9.11 (3)	7.13 (3)
c2	Standards and procedures are regularly reviewed.	7.35 (2)	6.24 (2)	4.85 (2)
b2iv	Procedures for review of complaints are written.	7.30 (2)	6.84 (2)	5.28 (2)
b1i	Rights of all groups are considered.	7.18 (2)	8.72 (3)	6.62 (3)
a1ii	Scope of activities is clear.	7.00 (2)	9.39 (3)	6.95 (3)
b2iiB	Procedures are published.	7.00 (2)	9.32 (3)	6.90 (3)

TABLE 25
(cont'd)

Comparative Weights of Criteria

	Criterion	Weight due to importance[a]	Weight due to observability[b]	Weight due to both[c]
c1	Agency is widely accepted.	7.00 (2)	7.92 (2)	5.86 (2)
a2v	Visiting teams include a nonstaff-member.	7.00 (2)	--	--
b5	Standards are evaluated.	6.70 (2)	5.78 (2)	4.09 (1)
b3i	Initial evaluation is at CEO's request.	6.60 (2)	8.62 (3)	6.01 (2)
b7	Innovation is encouraged.	6.40 (2)	5.96 (2)	4.03 (1)
b6	Evaluation of outputs is required.	6.30 (2)	8.86 (3)	5.90 (2)
b2iiE	Ownership is published.	6.20 (2)	9.32 (3)	6.11 (2)
a2iii	Fees are reasonable.	6.00 (2)	6.98 (2)	4.43 (2)
b2iiC	Current status and next review are published.	5.90 (2)	9.32 (3)	5.81 (2)
b2iiD	Membership of board is published.	5.90 (2)	9.32 (3)	5.81 (2)
b4	Ethical practices are fostered.	5.50 (2)	6.14 (2)	3.57 (1)
c4	All groups are represented on governing bodies.	4.60 (1)	8.13 (2)	3.95 (1)
a3ii	Preaccreditation is related to accreditation.	4.20 (1)	7.92 (2)	3.52 (1)
b2i	Public is represented on the board.	4.00 (1)	9.22 (3)	3.90 (1)

TABLE 25
(cont'd)

Comparative Weights of Criteria

	Criterion	Weight due to importance[a]	Weight due to observability[b]	Weight due to both[c]
b3v	Team member is present at evaluation of report.	3.60 (1)	9.18 (3)	3.49 (1)

Not judged:

a1i	Scope is national or regional.
a2iv	Personnel are competent.
b10	References to accreditation are clear.
c3	Agency has two years' experience or more

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[a] The weight is the Index of Importance, described in Footnote 2, p. 103, divided by 10.

[b] The weight for observability, W, is based on the median judgment of observability, R, according to the equation, $W = 3.5R - 4.4$, to place these weights on approximately the same scale as the weights given to importance. The equation was derived by equating extreme values on the two scales and assuming a linear relationship between them.

[c] The combined weight is the product of the two individual weights divided by 9.46, the square root of the maximum value of the product.

[d] Figures in parentheses are simplified, single-digit weights.

Computational Procedures for the Weights in Table 25

For summarizing the results of almost 100 individual judgments of importance for each statement, none of the usual indicators of central tendency, such as the mean or median, seemed appropriate. A seven-point scale was used for the ratings to provide some discrimination among the large number of statements expected to be judged high in importance while still allowing for some negative judgments. The J-shaped distributions of the ratings confirmed that expectation. The median rating, which would be appropriate for more uniform distributions, does not give adequate consideration to the comparatively few but important highly negative responses, since the large number of positive responses produces a median value near the top of the scale. The median does not discriminate, then, between a response distribution in which all the responses occur on the upper half of the scale and one in which a small but important number of responses are at the low end of the scale.

The index adopted to provide a more informative summary of the ratings for each accrediting agency attribute was the difference between the percentages of responses in the top two and bottom two categories of the seven-point scale (see Footnote 2, p. 103). This has an intuitive appeal in combining the more definite responses at either end of the scale while dropping out the intermediate judgments. It can be interpreted as the net percentage of high-importance responses. The disadvantage of this index is that it does not distinguish between U-shaped and inverted-U distributions, although neither does the median nor the mean. With the present data, inverted-U, or humped distributions of any kind, did not occur.

The index of importance, or the net percentage of judgments of high importance attached to a statement or attribute of an agency, ranged from 6 to 96, although only 5 of the 80 values were lower than 30, while 15 were 90 or higher. When the indexes were attached to criteria through averaging the values of the statements that directly reflected the content of a criterion, the values ranged from 36 to 96. Those values were arbitrarily divided by 10 to produce a set of weights ranging from 3.6 to 9.6 (Table 25), retaining a ratio of 2.5 for the highest to lowest weight, while putting the weights at an order of magnitude most people are comfortable with--a scale of approximately 1 to 10.

The judgments of observability were made on a four-point scale, since large numbers of extreme ratings were not expected. The median values ranged from 1.84 to 3.94 and showed a distribution very similar in shape to that of the indexes of importance. A linear adjustment could make the two curves almost coincide. The median judgments of observability were adjusted to put them on a scale similar to that of the index of importance by throwing out the three lowest values of the two curves. The result was the following equation, in which W is the observability weight on a scale similar to the scale of importance and R is the median value of observability:

$$W = 3.5R - 4.4$$

The resulting range was 2.04 to 9.39.

A multiplicative relationship was desired for the composite weights, since an extreme score on either of the two component scales should not have its effect diluted in the composite. If an arithmetic mean were used, a low weight for either importance or observability would be balanced to a large extent by the other weight, and the low weight that should be given to any quality that is either of negligible importance or virtually unobservable would not appear. The geometric mean--the nth root of the product of n terms--provides a multiplicative relationship but also dilutes the effects of low values. A hybrid form of mean was used, therefore, consisting of the product of the two weights divided by the highest geometric mean of any pair of weights. Thus the composite weights are a function of the product of the two component weights, but dividing by the highest geometric mean puts them on a scale similar to the other two scales of weights and keeps the composite weight low whenever either of the component weights is low.

THE APPLICATION OF WEIGHTS

Application to recognition decisions of any of the three sets of weights of Table 25 would presumably consist of assigning an agency the numerical value of the sum of the weights of all the criteria it met. Agencies with total values below a predetermined level would be denied recognition, and successively higher values would be required for recognition for successively longer periods. But determining where those dividing lines should be would require as nice an exercise of informed but subjective judgment as the current decision process without formal weights. No real reduction in the subjectivity of the decisions would be achieved.

Adding the weights of each criterion an agency meets, to produce a numerical score that would determine the agency's recognition status, specifies a type of decision that may not be appropriate. It assumes that failure to satisfy any particular criterion can be compensated for by satisfying any other. Failure to require that the visiting team meet with all appropriate groups, for example, could be balanced by the existence of appeal procedures, even though those two criteria have no obvious relationship. Some other characteristic, however, such as requiring a detailed and probing self-study, might realistically compensate for the failure to have the visiting teams meet with representatives of all interested groups. But compensating for one failure by satisfying a totally different kind of requirement is difficult to justify. The most important criteria might be considered inviolate, with failure to meet any of them fatal to the agency's recognition.

The inappropriateness of letting satisfaction of any criterion compensate for failure in any other can be partly avoided through a dual approach. For example, recognition might be based on satisfaction of every criterion having a simplified weight of 3 in Table 25, plus enough criteria weighted 2 and 1 to reach a specified score. With weights based on importance alone, and excluding criteria weighted 3, 42 points could be reached by satisfying every criterion weighted 2 or 1. A score somewhere above 30 for the lower-weighted criteria might be considered acceptable if all 18 of the criteria weighted 3 were satisfied. But this kind of process again involves subjective judgments no less difficult than those involved in reaching decisions without the use of weights, and it ignores the interactions among qualities. The seriousness of the failure to satisfy any given criterion depends on an agency's other characteristics and its ability, in view of its strengths, to compensate for particular deficiencies. But whether its strengths compensate appropriately for its particular weaknesses is the kind of decision the Advisory Committee now makes, and replacing their judgment with a mechanically applied formula is difficult to justify.

Combining observability with importance in calculating weights would reduce the effect on decisions of important attributes that are difficult to observe or evaluate. These include the criteria concerned with the fairness with which standards are applied (b8), the independence of the agency's judgments (d1), and the adequacy of the agency's staff and procedures (a2i) and financial resources (a2ii). Such a weighting scheme would separate the criteria concerned with procedural requirements, which are readily observed, from those related to the effectiveness with which those procedures are applied, which require the judgments of highly perceptive observers. Every criterion with a weight of 3 derived from both importance and observability was procedural. None of the criteria concerned with actual effectiveness had a weight greater than 2.

SUMMARY

Three sets of weights were calculated for 40 of the 44 criteria, excluding four that had not been judged for either importance or observability. One set was based on the judged importance of statements that were either direct restatements of a particular criterion or direct statements of a component of a criterion. When more than one statement referred directly to a given criterion, judgments of their importance were averaged to give a weight to that criterion. A second set of weights was based on judgments of the degree to which compliance with each criterion can realistically be observed. The underlying assumption for these weights was that important considerations in the decision process should not carry a high weight if they cannot be accurately assessed. Finally, a set of weights was provided that combined the first two.

The composite weights were highest for the criteria that were both important and readily observable. These were invariably criteria concerned with procedural requirements and organizational structure. Criteria judged important but difficult to observe were those that involved the effectiveness or quality rather than the form or structure of an agency's activities. These received lower composite weights. A few criteria, judged low with respect to both standards, were given the lowest composite weights.

Despite clear differences in judged importance among some of the criteria, the use of a formal system of weights is not desirable for decisions like the recognition decisions. The relationships among the various criteria and their components, which are likely to cause the desired weights to fluctuate with different circumstances, as well as the absence of any explicit, single standard of accrediting agency effectiveness, make a decision process based on a fixed system of weights questionable. The existing procedure, in which knowledgeable, informed persons weigh each criterion in the context of an agency's particular strengths and weaknesses, is preferable. The criteria are implicitly weighted in that process, but the weights are suited to the circumstances. Yet the problem presented by important qualities that are difficult to evaluate is not avoided by weighting them less heavily than the important but readily observable qualities, or by weighting them equally with the observable qualities of comparatively low importance. The problem is serious, but it can be met realistically by focused efforts to define those important qualities in enough scope and detail to permit effective evaluation procedures to be devised.

XI. IMPLICATIONS AND RECOMMENDATIONS

The present recognition procedures effectively discriminate among accrediting agencies with respect to a well-developed set of organizational and procedural standards. Accrediting must follow procedures that have been established by an agency with enough clarity and strength to protect its decisions from ineptitude, carelessness, inadequate resources, bias, conflict of interest, and other threats to sound and impartial evaluations. Most of these standards are strongly endorsed by virtually all groups with an interest in accrediting (Chapter VI). They provide a widely accepted model for accrediting and state approval agencies that, by focusing on organizational structure and evaluative procedures, avoids prescribing educational content, standards, or procedures while encouraging sound accrediting practice.

No evaluation of a process as complex as the recognition of accrediting agencies can be adequately summarized, however, in a few simple judgments. Some parts of the process will invariably be more fully developed than others, and observations of particular rather than global qualities will therefore be more informative. The implications discussed below, and the recommendations that follow, point out areas in which the possibilities are greatest for improving the reliability and validity of the recognition process, as well as the areas in which the process is particularly effective.

The criteria include in some form all the appropriate issues related to the evaluation of educational quality as that process was viewed by a wide range of experts. Despite wide variability in specificity and clarity of definition of the criteria, the recognition process was shown to discriminate consistently among agencies from year to year, and the qualities on which those discriminations rest were judged pertinent to the evaluation of educational quality. The process is particularly strong in promoting sound administrative and evaluative procedures among recognized agencies.

EVALUATING THE EFFECTIVENESS OF PROCEDURES

Several recognition criteria move beyond procedural issues to imply standards of effectiveness that are not defined. Accrediting procedures must effectively reject unqualified programs or institutions. Standards for accreditation must be applied with fairness and consistency. An agency's staff, visiting team members, and governing board members must be competent, and its financial resources must be sufficient for its purposes. All these are important accrediting agency qualities that are difficult to evaluate. That such qualities may require the subjective judgments of astute observers, however, does not reduce the obligation to evaluate them as accurately and completely as possible. The reliability of the recognition process could be increased by avoiding these difficult evaluative tasks, but its validity would be correspondingly reduced.

Qualities involving effectiveness or merit rather than the presence or absence of an observable procedure can be evaluated with acceptable levels of reliability and validity without avoiding the subjectivity that necessarily underlies their assessment. The necessary requirements are clarity, scope, and detail, but not rigidity, in the definitions of those qualities, and a variety of devices or procedures to indicate various forms of effectiveness. Meeting these requirements is not necessarily either complicated or costly, yet its accomplishment would add substantially to the validity of the recognition process by increasing the empirical base for inferences about the effectiveness of accrediting agencies. A major part of the recommendations that follow involves procedures for defining and evaluating qualities of effectiveness--for accreditation, as well as for recognition, where the need may be as great.

THE STRUCTURE OF THE CRITERIA

One form of validity requires evidence that the entire range of agency characteristics related to their evaluation of educational quality be assessed in the recognition process. The assessment must be complete. While the present study indicates that that is the case, the suggested restructuring of the criteria (Chapter IV) can help in periodically reexamining that issue. All the present criteria for recognition of an agency are encompassed in three broad areas--scope and purpose, organizational structure, the quality of the personnel, and financial strength; accrediting and evaluative procedures, including the formulation and application of standards; and responsiveness to the needs and interests of the various constituencies, including the general public. If issues relevant to the evaluation of educational quality can be found that are not included in these three general areas, the recognition criteria will have been demonstrated to be incomplete. No such issues were found in the present study.

The components of each general area can also be examined to assure that they fully cover the area. Issues about which there is some dispute can be evaluated to determine whether a proposed additional criterion, such as one requiring more specific attention to consumer protection, fills a gap in the existing structure, is redundant, suggests a needed modification of the structure, or is not relevant to the evaluation of educational quality. Another kind of dispute, concerning existing criteria to which objections have been raised, can be addressed by examining how comfortably the questioned criteria fit the rest of the structure. In the suggested structure of Chapter IV, for example, including ethical practices and the encouragement of experimentation and innovation under responsiveness seems forced. They were not clearly located in the factor analyses and, at the least, require clarification and elaboration.

OBSERVATION IN THE RECOGNITION PROCESS

The nature of most of the criteria, with the exceptions noted above for those concerned with effectiveness, permits them to be readily observed and evaluated through documentary evidence that describes the agency's structure and procedures. Observations of visiting teams and commission meetings provide some evidence of adherence to the prescribed procedures. But substantial room for error exists. An agency can be actually observed putting its procedures into practice on only limited occasions, and the existence of appropriate procedures does not ensure their effective implementation. Expansion of the scope and variety of DEAE's procedures for observing the performance of accrediting and state approval agencies, in addition to their structure and established procedures, is likely to produce an appreciable improvement in the validity of the recognition process, although possibly at some cost in the form of reduced reliability.

The most direct evidence of the effectiveness of an accrediting agency is the quality of its products or the consequences of its actions. Evaluative observations are best directed to wherever those products or consequences can best be observed. The self-studies, the site visits, and the commission meetings to evaluate the results of the site visits are probably where the consequences of an agency's activities can best be observed. At present, they are sources of information for recognition, but they could be exploited more fully. Selected aspects of those three activities could be singled out for observation and information gathered from different participants. A moderately detailed schedule of evaluative information to be collected from samples of participants in the accrediting process--agency staff, commission members, faculty and administrators of programs or institutions evaluated, students, members of professional associations and licensing boards--could be followed without imposing a heavy burden on particular individuals or institutions. If collection of that evaluative information were left to the agencies, its threat would be reduced and it would serve a function similar to that of the self-studies of institutions or programs. DEAE's function could then be that of an auditor of the agency's self-evaluative information. This possibility and the other issues described above are addressed more fully in the recommendations.

RECOMMENDATIONS FOR DEAE

An important purpose of the study was to develop recommendations for procedures that the Division of Eligibility and Agency

Evaluation might follow in a continuing program of self-evaluation. Its focus would be the suitability of the recognition criteria and the effectiveness of DEAE's evaluative procedures. Since the criteria require that accrediting agencies evaluate their standards and the effectiveness with which they are applied, DEAE might reasonably be expected to demonstrate that process in its own activities. While the present study produced evidence of reliability and validity, the recognition process is not and should not be static. Continuing or periodic reevaluation is important.

A project of the magnitude of the present study would not be feasible for most accrediting agencies and could not be carried out at frequent intervals by DEAE. In that sense it cannot serve directly as a model for DEAE or for accrediting agencies in evaluating their own standards and procedures. Yet problem areas have been identified, evaluative concepts and principles have been demonstrated, and selected aspects of the procedures of the present study can be applied both by DEAE and accrediting agencies. The following recommendations were formulated with awareness of the limitations necessarily imposed by cost considerations.

Reliability

As was pointed out in Chapter II, reliability is the absence of random or unsystematic error in a process. It is indicated by the consistency of the results, which can be evaluated at the end of a process as well as at a number of intermediate points. The degree of consistency in the end results of a process indicates its overall reliability. But consistency in the final product may be more difficult to observe than the consistency of several intermediate or contributing processes, and the reasons for the error or inconsistency may not be evident in the final product. An effective program to evaluate and maintain the reliability of a process must therefore be directed to each step in the process where error might enter.

With respect to the recognition process, error can be introduced at the point where observations are made, at the various points where the information is transmitted or transformed (as from the observation itself to the report of the observation, or from the report to its consideration by the Advisory Committee), and in the final deliberations leading to a decision. The presence and extent of the error can be estimated through observations of the consistency of the information.

Consistency in the initial observations can be assessed by using more than one observer and comparing their observations. This does not necessarily require independent visits to an agency by two or more observers and independent reports. Such a procedure would be costly and not the most effective way of identifying differences in the observations. A more productive process would have several observers make a moderate number of observations about several explicit aspects of an agency. For example, several criteria require agencies to publish information about themselves--a clear statement of scope and purposes, explicit definitions of each accreditation status, current standards and decision procedures, effective procedures for review of complaints, and others. Each of these criteria can be evaluated through an examination of agency documents. The reliability of those observations could be assessed by gathering a sample of documents related to each of several criteria and asking DEAE staff personnel and consultants--those who regularly make the observations--to evaluate the sets of documents. Others, such as faculty members, administrators, and agency directors might also profitably be asked to make the judgments about the same documents. Consistency of observations or judgments among DEAE's staff members and consultants regarding several kinds of information about several different criteria could then be assessed.

Agreement or consistency might be high with respect to clarity of scope but less impressive with respect to the adequacy of the published decision procedures. If agreement was low for a particular criterion, steps could then be taken to identify the source of the disagreement, which may lie with the observers, with lack of clarity in the criterion, or with the documents. Whether agreement was high or low, an index of interjudge agreement, such as the kappa index used in the present study, could be calculated to describe the reliability of the collective observations of all the criteria judged, as well as the reliability of the judgments of each separate criterion.

Two points in the preceding paragraphs deserve particular emphasis. First, the intent of the process described was to focus on a limited group of related criteria rather than on one criterion or many. Limiting the effort to studying a few criteria at a time keeps the cost manageable. Over a period of several years, all the criteria can be evaluated.

The evaluation of several kinds of observations or several criteria, rather than one at a time, is desirable not only in the interest of economy, but also because the degree of consistency or reliability is likely to vary. Assessing the reliability of several kinds of observations provides a context in which the reliability associated with a single kind of observation can be evaluated. Further, if several criteria are reliably observed while one or two are not, the inconsistency may suggest the nature of the difficulty with the criteria that were not reliably observed. In the present study, for example, the differences in observability between qualities reflected simply in the existence of appropriate documents or procedures, and those related to the effectiveness of an agency's activities, pointed out a major distinction between criteria. The first kind are inherently observable; the second are not.

The second point to be stressed is that the procedure described assesses the reliability of only one important aspect of the recognition process--the observations themselves. Their meaning may later be distorted, or error introduced, when summarized in a written report, when discussed in an Advisory Committee hearing, or when combined with other information in reaching a decision about an agency.

The reports are usually the result of the collaborative efforts of several DEAE staff members, and are written after discussion of the observations with the person who has direct responsibility for the report. Variations in perceptions or emphases are therefore reduced in the process of writing the report. Systematic errors or distortions of the "true" state of affairs may or may not be affected by collaborative report writing, but those errors will affect the validity rather than the reliability of the process. If the consistency of the process is increased, its reliability will be increased whether or not the consistent information is correct.

Errors in consistency in the report-writing process could be both assessed and reduced if two groups of DEAE staff members were to review the same observational data and produce two independent reports. In the interests of specificity, time, and cost, however, only limited sections of reports concerned with a small group of criteria might be treated this way. The differences in the specific statements composing the two reports would indicate the degree of agreement and the nature of the disagreements. One such comparison each month over the course of a year would increase the overall reliability of the reports as a whole while providing an estimate of its level.

The reliability of the decision process could be similarly assessed. The Advisory Committee typically considers petitions for recognition in two subcommittees meeting simultaneously, each hearing oral presentations by representatives of the agency under consideration, and by other interested persons who may offer information. The two subcommittees consider separate groups of petitions and recommend decisions to the full Committee, which then votes on a decision that is recommended to the Commissioner. While the creation of the new Department of Education has abolished the office of Commissioner, the function of the Advisory Committee in recommending a decision has not changed. The reliability of the Advisory Committee's actions could be evaluated by having two or three petitions considered by both subcommittees at each of their quarterly meetings. As with the written reports, learning the reason for any discrepancies would lead to an improvement in reliability, and the eight or twelve decisions replicated during the course of a year would permit an estimation of the overall level of reliability of the Committee's recommendations.

Alternatively, the subcommittees could be split for the dual consideration of two or three petitions at each quarterly meeting. That arrangement would not add to the Committee's work load but would temporarily separate two three- or four-person groups within a subcommittee while they considered the same petition. Their independent decisions would be recorded to assess the reliability of the process, and then their joint examination of the two decisions would lead to the recommendation to the full committee.

While the time required for consideration of a particular petition might be increased slightly by having two sub-subcommittees discuss a petition before they recombined for the reconciliation of their differences, that might not be the case. Three- or four-person groups might reach decisions more quickly than a seven- or eight-person group, and if the decisions of the two smaller groups agreed, little if any time need be taken in further deliberation. During the course of a four-meeting year, if two petitions per meeting were considered separately by independent halves of the two subcommittees, a total of 16 recommendations would be available for estimation of the Committee's reliability. Three petitions per meeting considered by independent halves of the two subcommittees would in a year produce 24 cases from which to estimate reliability.

If experience should show that the three- or four-person groups produced reliable decisions, they might then be used regularly for the less complex or the less controversial petitions the Committee must evaluate. With the Committee's work load continuing to increase, the use of four rather than two subcommittees could be an effective way to increase the Committee's efficiency and handle the increased load.

The reliability with which information is taken from agency documents can be assessed by comparing two or more sets of independent observations of the same documents. Although xerox copies of on-site visits or commission meetings are not yet available, the replication of observations in the field can be carried out, even if at somewhat greater cost than the duplicating of documents. Observations of two visiting teams or two commission meetings or two other agency settings could be made by different DEAE staff members at different times, and their results compared. Again, to keep the cost and the burden on the accrediting agency reasonable, the repeated observations should be limited to particular aspects of the criteria, such as evaluation procedures or fairness. The two sets of observations should occur within three or four weeks of each other to avoid the possibility of changes in agency procedures from one set of observations to the other. If the board or commission only meets at six-month intervals, the two observers might attend the same meeting on different days.

Dual observations of the same limited set of criteria at eight or ten different agencies during the course of a year would provide a realistic set of data from which to estimate the reliability of the more difficult observations. Differences in the content of the observers' reports about the same agencies could result either from differences in the observers' perceptions or from differences in the particular activities observed. Either source of inconsistency would reduce the reliability with which that particular criterion was being evaluated. Regardless of the source of the error, if the reliability was too low for much confidence to be placed in the accuracy of the evaluation--that is, if the inconsistencies were so great that the quality of an agency with respect to that characteristic could not be stated with confidence--some procedural change would be required. The most likely steps would be to clarify the erratically observed criterion and expand the observations related to it.

Whatever the sources of unreliability in the recognition process--whether the observations themselves are erratic or the information they provide shifts as it is moved through the process--error can be reduced through the use of greater numbers of observations. Fairness, for example, might be observed in the assignment of visiting team members; in the intensity, scope, or thoroughness of the visit; in the apppointment of governing board members; or in the implementation of a requirement for the evaluation of student learning. Observations that raised questions about the fairness or integrity of an agency in several of these areas would be far more serious than an observation of an isolated questionable practice. Each of the examples above is associated in part with a different criterion, but each can be applied as well to Criterion b8, which is concerned explicitly with fairness and impartiality in most aspects of an agency's activities--its standards, policies, procedures, evaluations, and decisions. The qualities most difficult to observe--fairness, effectiveness, and competence, for example--are those that should be the focus of a wide range of specific observations. The present study indicated that Criterion b8 on fairness, d1 on autonomy, and a2i and a2ii on the adequacy of staff and financial resources were among the most important criteria and among the most difficult to observe. They require a wider range of related observations if the reliability of their evaluation is to be brought closer to that of the more observable criteria.

Recommendations for Evaluating and Improving Reliability

The preceding discussion leads to the following recommended procedures for DEAE:

1. Establish review committees composed of DEAE staff, accrediting agency personnel, and others to review the criteria most difficult to evaluate (starting with those

listed immediately below) and recommend additional observable indicators of agency performance pertinent to those criteria.

- b8. Fairness, impartiality
- a2i. Adequacy of staff and procedures
- d1. Independence of judgment
- a2ii. Financial strength and independence

2. Separate the criteria into sets that are similar in content and degree of observability; establish a regular system through which the reliabilities and validities of all the criteria are evaluated over a four- or five-year period, one set at a time.

3. Establish a regular process of dual observations of documents that bear on selected sets of criteria.

4. Establish a regular process through which dual observations in the field are made of accrediting agency practices related to selected sets of criteria.

5. For those criteria that show low consistency of observation, establish review committees of DEAE staff members, other interested persons, or both to study the nature of the disagreements and suggest clarification, elaboration, or revision of the criteria; improved training of the observers; clarification of guidelines to the agencies; or

additional sources of information pertinent to the erratic observations.

6. Establish a regular pattern of dual report preparation for selected sets of criteria to be followed by study and clarification of the areas for which consistency was low.

7. Assess the consistency of Advisory Committee activities by having two or three petitions per meeting evaluated independently by both subcommittees or by independent halves of the subcommittees.

Validity

While reliability involves a search for consistency, the assessment and improvement of validity require the development of empirical support for the desired inferences. For example, satisfaction of Criterion b8 implies that an agency carries out its actions fairly and impartially. Evidence of impartiality that is independent of the information that determined the satisfaction of Criterion b8 would support that implication. One way to demonstrate validity, therefore, is to show agreement in the results of several independent sources of evidence for each criterion.

A second aspect of validity is the completeness of the supportable inferences. If fairness is to be inferred, all of its components should appear in the pertinent evidence. Observations related to one component in a single context cannot adequately support inferences about fairness in general. The validation of a process therefore requires some attention to the scope and range of application of the pertinent evidence. In the present study, almost all the criteria were reflected in the recognition decisions, but the completeness of the evaluation of each criterion was not clear. Further elaboration of some of the criteria, particularly those difficult to observe, may indicate certain of their aspects that have not been regularly evaluated.

A third way to support the inferences drawn from any process is to compare the results of the process with those of independent activities that had a similar purpose. Attention would be given to the process as a whole rather than to its components. That kind of validation was illustrated in the present study by the group of judges who provided their own recognition decisions for comparison with the actual decisions.

DEAE might carry out a similar process every four or five years, checking a sample of actual decisions with those made by a selected group of persons whose knowledge of accrediting is respected. The nature of the activities of the validating group of experts would determine whether the entire process or only a part of it were to be validated. If the experts were provided just the information available to the Advisory Committee--the agency's petition, the DEAE staff report, and a transcript of the hearing before the Committee--the validation would refer only to the Advisory Committee's actions. Evidence would not have been provided as to the accuracy and completeness of the information from which the Committee worked. For the entire recognition process to be validated, a complete evaluation, independent of the DEAE evaluation, would be needed for a sample of agencies. Such a procedure would be difficult, expensive, and probably unjustifiable.

A simpler way to validate the overall results of the recognition process would be to compare recent recognition decisions with other indicators of overall agency quality. A variety of limited indicators of quality or effectiveness could, in the aggregate, be expected to reflect the general quality indicated by recognition. One such indicator might be the proportion of the total population of eligible institutions or programs that seek accreditation from an agency. Another might be the proportion of unfavorable decisions that are appealed. A third might consist of comparisons of programs or institutions accredited and denied accreditation with respect to some pertinent index of quality.

Even these limited examinations of qualities associated with different recognition decisions are likely to be more elaborate and expensive than their usefulness may justify. Accrediting or state approval agencies and the issues with which recognition is concerned are so complex that gross comparisons of agencies recognized and denied recognition are not likely to be very informative. A more productive and more efficient process would consist of a series of intensive evaluations of limited aspects of the recognition process, applied to a small sample of agencies, and cumulated over a period of four to six years. By the end of that period, changes in accrediting, in postsecondary education, and in the nature of the public concerns would probably make revalidation of some aspect of the process desirable.

Alternative Sources of Evidence

Feasible sources of information or evidence for continuing validation of the recognition process include the petitions and other documents submitted by the agencies, the direct observations made by DEAE staff and consultants, the attitudes and opinions of others as presented in correspondence or in direct testimony before the Advisory Committee, and attitudes and opinions solicited from persons who have had particular kinds of experiences with accrediting. Each of these sources except the material from the Advisory Committee meetings was used in the present study, and each could be used in future assessments of validity. If two or more of these or other sources of information were to lead to similar inferences about a particular criterion, that agreement between dissimilar kinds of information would provide empirical support for the inferences to which both kinds of information led. The following discussion of the criteria related to fairness illustrates the point.

Fairness, in its several contexts, refers to the application of an agency's established standards and procedures, the impartiality of its decision process, and the absence from its accrediting activities of conflicting functions or competing interests. The most common sources of information about fairness are (1) documents provided by the agency that describe functions and procedures designed to reduce the possibility of bias, and (2) direct observations of the agencies' activities by DEAE staff members or consultants. For example, written procedures that permit board or commission members to participate in or influence decisions about their own institutions constitute documentary evidence of the possibility of biased decisions. Similarly, an observation in a commission meeting that qualities not part of the published standards had influenced an unfavorable accreditation decision would also constitute evidence of unfair application of standards. Neither of these observations, in the absence of further information, would justify a conclusion that the agency had exhibited a general lack of fairness. But the evidence from the documents alone would be more convincing if the participation of commission members in decisions on their own institutions were more frequently observed in agencies without clear procedures to prevent it. And if observations that decisions in board or commission meetings were being based on issues that did not appear in published standards were often accompanied by similar reports from constituent programs or institutions, the utility of such observations would be confirmed.

A third source of information, in addition to the agency's documents and direct observations by DEAE personnel, might be a body of observations collected from programs or institutions evaluated by the agency in recent years. They could take the form of a short checklist of possible instances of agency behavior that either demonstrated fairness or raised questions about it, followed by phone calls from DEAE for amplification. Alternatively, a letter to from 20 to 30 recently evaluated programs outlining the nature of the concerns for fairness, followed by a telephone interview, would provide similar information. However collected, the information should be limited to the issues of immediate concern and to a small number of agencies.

Completeness of the Evidence

Inferences about quality of performance or effectiveness are often challenged on the ground that they are based on incomplete evidence, that the observations are pertinent only to small parts of the isssue of concern. A high degree of effectiveness in limited aspects of a complex process, such as accreditation, does not necessarily imply a high level of performance in general.

Expert judgment is the usual basis for determining whether an evaluative process is sufficiently comprehensive. The recourse to expert judgment, however, should be systematic.

Evaluating the completeness of the content or scope of a process can take two complementary forms. In one, the evaluator examines analytically the coverage within defined boundaries, searching for gaps. In the other form, knowledgeable persons examine the predefined boundaries to determine whether they are over-inclusive or not inclusive enough. Any redefinition of the boundaries around the pertinent issues is then followed by a new analysis of the redefined areas. Both these processes require the judgments of experts, but however competent the experts may be, the quality of their judgments will be improved through prior analysis and careful presentation of the issues to be judged.

A third kind of expert judgment may usefully follow the first two. The relevance of the observations made, or of the information collected, requires demonstration. For example, a complete catalog of all the issues related to the evaluation of educational quality and nominal attention to every item in the catalog do not of themselves assure adequate coverage; the particular observations of each item must be pertinent. The determination of pertinence may rest partly on expert judgment, but the convergence of two or more independent sources of evidence leading to a common inference is a stronger base for the determination of validity.

In the evaluation of criteria related to fairness, about 50 somewhat distinct descriptive statements were used by DEAE staff members during the 10-year period from which reports were analyzed. They ranged widely in specificity from "No more than one member of the policy- or decision-making body may be affiliated with the same institution" to "The agency's published procedures are fairly applied." A small but varied group of knowledgeable persons reviewing those 50 statements could judge the adequacy with which they covered all aspects of the four criteria related to fairness. They might also suggest additional ways in which the quality of fairness in an agency's operations should appear. Even-handed treatment of objections raised by institutions to particular visiting-team procedures, or variations in the rigor with which particular standards were applied, are examples of agency performance with respect to fairness that tended not to appear in the DEAE staff reports. A variety of other examples, with suggested procedures for observing them, could be produced by a small group of people who gave their attention exclusively to manifestations of fairness and unfairness.

Recommendations for Evaluating and Improving Validity

The most effective approach to maintaining the validity of the recognition process is likely to be a combination of the procedures described above--bringing independent sources of evidence to bear on a particular quality, and evaluating the completeness with which various issues are assessed. The first evaluates the fidelity with which each important attribute of an agency is described. The second provides evidence that the process is directed to the proper issues in the evaluation of educational quality and is sufficiently comprehensive. The following activities are therefore recommended, in addition to Recommendation 1 and 2, listed earlier under Reliability, which also apply to the evaluation of validity.

1. Using a sample of 10 to 15 agencies that in prior evaluations varied in their effectiveness with respect to a limited group of criteria, intensify the observations pertaining to those criteria through one or more of the following procedures.

    a. Gather amplifying documents related to the criteria being evaluated, in addition to the petition and the supporting documents that accompanied it. These might include, from the agency itself, lists of visiting team memberships for the preceding two to five years, guides for programs or institutions, visiting team reports, and records of actions taken during the preceding few years. Programs or institutions might be asked for copies of self-studies, reports of agency decisions, or responses to the agency's reports or decisions. Some documents may be confidential, but if the requests for documents are limited and specific, as they should be, problems of confidentiality and accessibility may be avoided. Specified sections of a report, for example, with institutional identification deleted, may be provided when the full report would not be.

b. Provide an opportunity for DEAE personnel or consultants to observe the circumscribed groups of criteria and agencies more intensively, either by extending the time the DEAE observer spends on those qualities or by having a second observer concentrate on them.

c. Solicit reports from samples of programs or institutions recently evaluated by the agencies under observation regarding instances of agency performance relevant to the criteria of interest. These should focus explicitly on the stated criteria and should ask only for the experiences of that program or institution. A second stage might follow in which all the instances described by the sampled programs or institutions would be sent, in the form of a checklist, to a larger sample of agencies to determine the frequency of each type of agency performance.

d. Collect information on potential correlates of agency effectiveness that may be provided by sources other than the agency or its associated programs or institutions. These other sources might include, but are not limited to, licensing boards, other state agencies, and other postsecondary educational associations, such as the Council on Postsecondary Accreditation or the American Council on Education.

2. Evaluate, through one or more of the following procedures, the scope and meaning of the indicators of performance associated with the groups of criteria referred to in Recommendations 1 and 2 under Reliability.

    a. Ask a selected group of 50 to 100 knowledgeable persons to indicate, on a short questionnaire, the importance of each indicator of agency effectiveness to one or more of the general issues the criteria address. The list should consist of 20 to 40 observable agency characteristics that are, in effect, to be sorted into categories according to their degree of importance to each of the criteria of interest. One procedure for accomplishing this, though not the only one, would be to list each characteristic on a card, provide an envelope labeled with each of the four or five criteria of interest, and ask the judges to place each card in the most appropriate envelope. The judges should have the option of not putting a card into any of the envelopes if none seemed appropriate. The judges could then assess the importance of each characteristic to the criterion with which it was associated. Finally, the judges could be provided blank cards on which to add characteristics pertinent to the several criteria. The result would be judgments of the adequacy with which existing evaluation procedures cover the criteria.

b. Select 10 or 12 agencies that differ in the degree to which they satisfy one or more of a small group of criteria. Send each agency the statements related to those criteria with which it was described in the most recent DEAE staff report, with the observations on which the statements were based. Ask the agency director to indicate the accuracy of each statement, its importance to the criterion with which it was associated, and other observations that would have improved the evaluation of that agency with respect to that criterion. The additional observations suggested should then be evaluated through some procedure similar to that described above in Paragraph a.

c. Repeat the procedure described above in Paragraph b, sending the sets of statements to the accrediting liaison officer or other person concerned with accrediting at a small sample of programs or institutions recently evaluated by each of the agencies identified in Paragraph b.

The recommendations made for both reliability and validity focus the effort on limited aspects of the recognition process while spreading it over time. Although this keeps the cost and time requirements as light as possible, it does require the coordination of the activities over a period of time for the results to cumulate into a comprehensive description. Reliability and validity are both costly to evaluate. They require intensive observations. Yet without evidence to demonstrate consistency and support the inferences drawn from the results of an evaluative process, the process itself is hard to justify. The focused, cumulative approach recommended above minimizes costs while providing a sound foundation for defensible evaluative judgments.

RECOMMENDATIONS FOR ACCREDITING AGENCIES

The recognition process is similar in many ways to accrediting and state approval. The petition for recognition is similar to the self-study of a program or institution. The visit by DEAE staff is similar to a site visit. The Advisory Committee's role in the recognition of agencies is similar to that of commissions in the accreditation of institutions and programs.

The limitations of the two processes are also similar though more severe for recognition than for accreditation. For example, the criteria for recognition may not impose educational or curricular requirements on agencies, and the educational substance of the programs or institutions accredited may not be circumscribed. The regional accrediting commissions are similarly constrained in their attention to the process rather than the substance of education, although a concern for standards cannot always be clearly separated from a concern for educational substance. The specialized agencies, being more directly involved with educational content, have more complex problems with reliability and validity than do the regional agencies. They must justify curricular requirements that the regional agencies avoid.

The procedures illustrated in the present study, and the recommendations made for evaluating the reliability and validity of the recognition process, can be used with some modification and elaboration by accrediting agencies, and in fact some have done so. Each recognized accrediting or state approval agency must have clearly defined standards. Establishing empirical support for the inferences to be drawn from whether the standards are satisfied, and for the consistency with which the standards are applied, may be accomplished in much the same way as for the recognition criteria and procedures.

Both reliability and validity are improved when standards are clear in meaning and scope. Without clarity of meaning, the observations from which performance can be inferred are difficult to identify. Without well-defined boundaries, the comprehensiveness of an evaluative procedure cannot be established. A first step in an agency's evaluation of its standards may well be to identify the nature of the evidence on which compliance is based. Review of the intent of a particular standard, and of the customary procedures for its evaluation, by a small group of experts may then reveal important aspects of the standards that are not well assessed, and may suggest additional kinds of observations likely to be useful for one or more of the standards.

Most accrediting agencies carry out self-evaluative procedures that approximate the process described above. Their procedures, however, tend to be less systematic than is necessary for confidence to be placed in the results. Most groups of experienced faculty members and administrators could suggest procedures that would be acceptable indicators of educational effectiveness, and many agencies have implemented the recommendations of such groups. A group of experienced persons, for example, can undoubtedly specify a number of ways to evaluate whether the instructional objectives of a program are being achieved. The training and experience of the faculty can be reviewed; the formal organization of the instruction, which defines the nature and scope of the contact between faculty and students, can be examined; the tasks required of students, and the procedures for evaluating student performance, can be observed; and examples of student performance in advanced levels of the program, and achievement in the activities for which the program prepares students, can be evaluated. But until the consistency and implications of the specific observations are established, judgments based on those observations remain speculative.

Beyond the general meaning of observations, their variation with different circumstances must be understood. In some programs, the professional competence of the faculty may not be a sufficient indicator of effective instruction. Different instructional formats may be successes or failures depending on the particular qualities of the faculty, the students, and the material to be learned. And observers will inevitably differ in their evaluations of student achievements, instructional effectiveness, and curricular appropriateness. They can only be brought to acceptable levels of agreement if they are clear about the purposes of the evaluation and the nature of the standards they are to apply. In addition to differences in observers, separate components of instructional effectiveness may not be consistent. Student achievement may be high, for example, despite a mediocre faculty or a poorly structured curriculum if only one of those weaknesses is present and other conditions are favorable.

In short, evaluative procedures that seem most plausible may produce misleading results. A systematic process for examining how apparently sensible procedures actually function, in terms of consistency and empirically supported interpretations, are necessary to sound evaluations. As with the recognition criteria and procedures, the complexity of accreditation is such that evaluation of the reliability and validity of standards can probably be carried out most productively if it is done in limited pieces that are cumulated over time. A process is therefore recommended that is modest in scope, comparatively intense within that scope, and continuous rather than intermittent.

SUMMARY EVALUATION OF RECOGNITION CRITERIA AND PROCEDURES

Several aspects of the recognition process stand out clearly in the body of information that has been presented. Representatives of a broad spectrum of the constituencies of accrediting consider almost all the criteria to be important and see no additional issues that should be included. Most of the criteria refer to explicit, readily observed aspects of an agency's structure and procedures that make sound educational evaluation probable. In scope and content, the criteria serve their purpose well.

The application of the criteria is consistent in making the same kind of broad distinctions among agencies in any given year and from year to year. The decisions reached reflect distinctions that experts agree are appropriate and important, and the independent judgments of experts largely agree with actual recognition decisions. The recognition process is therefore functioning effectively, resulting in the intended kinds of discriminations among accrediting bodies. Further, an appreciable proportion of accrediting agency directors attribute improvement in their operations to the recognition process.

Nevertheless, the present study did show some weaknesses. Views of the importance of several criteria were mixed; about as many agency directors and other experts judged these criteria unimportant as important. One of them--the criterion requiring public representation on governing bodies--was among the criteria that were particularly influential in discriminating recognized agencies from those denied recognition. The validity of the process suffered to the extent that the influence of that criterion on the decisions was out of proportion to its importance. Corrective action should not, however, take the form of a formalized system of weights to be attached to the criteria in proportion to their importance, but should continue to rely on the Advisory Committee's judgment in each particular decision. A limited but continuing program of evaluation of the criteria would provide the Committee with appropriate information on which to base their necessarily complex judgments. The present study, for example, may lead the Committee to reevaluate the importance it has placed on public representation.

A more serious weakness is the difficulty of evaluating the merit or effectiveness of an agency's activities. About a third of the criteria require judgments of effectiveness--the adequacy of the agency's staff and financial resources, the fairness of its decisions, the integrity of its actions. These criteria are all judged to be high in importance but difficult to observe. Elaborating their definitions and developing a wider range of observable qualities to serve as indicators of an agency's success in meeting them would go farther than any other action to improve the validity of the recognition system. Recognition then would imply not only that an agency had the organizational structure and prescribed procedures in place to carry out educational evaluations effectively, but that that effectiveness had been demonstrated.

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APPENDIX A

Criteria for Nationally Recognized Accrediting Agencies

(a) Functional Aspects

(1) Scope of operations:

(i) The agency or association is national or regional in its scope of operations.

(ii) The agency or association clearly defines in its charter, by-laws or accrediting standards the scope of its activities, including the geographical area and the types and levels of institutions or programs covered.

(2) Organization:

(i) The agency or association has the administrative personnel and procedures to carry out its operations in a timely and effective manner.

(ii) The agency or association defines its fiscal needs, manages its expenditures, and has adequate financial resources to carry out its operations, as shown by an externally audited financial statement.

(iii) The agency's or association's fees, if any, for the accreditation process do not exceed the reasonable cost of sustaining and improving the process.

(iv) The agency or association uses competent and knowledgeable persons, qualified by experience and training, and selects such persons in accordance with nondiscriminatory practices: (A) to participate on visiting evaluation teams; (B) to engage in consultative services for the evaluation and accreditation process; and (C) to serve on policy and decision-making bodies.

(v) The agency or association includes on each visiting evaluation team at least one person who is not a member or its policy or decision-making body or its administrative staff.

(3) Procedures:

(i) The agency or association maintains clear definitions of each level of accreditation status and has clearly written procedures for granting, denying, reaffirming, revoking, and reinstating such accredited statuses.

(ii) The agency or association, if it has developed a preaccreditation status, provides for the application of criteria and procedures that are related in an appropriate manner to those employed for accreditation.

(iii) The agency or association requires, as an integral part of its accrediting process, institutional or program self-analysis and an on-site review by a visiting team.

(A) The self analysis shall be a qualitative assessment of the strengths and limitations of the institution or program, including the achievement of institutional or program objectives, and should involve a representative portion of the institution's administrative staff, teaching faculty, students, governing body, and other appropriate constituencies.

(B) The agency or association provides written and consultative guidance to the institution or program and to the visiting team.

(b) Responsibility

(1) Its accreditation in the field in which it operates serves clearly identified needs, as follows:

(i) The agency's or association's accreditation program takes into account the rights, responsibilities, and interests of students, the general public, the academic, professional, or occupational fields involved, and institutions.

(ii) The agency's or association's purposes and objectives are clearly defined in its charter, by-laws, or accrediting standards.

(2) It is responsible to the public interest, in that:

(i) The agency or association includes representatives of the public in its policy and decision-making bodies, or in an advisory or consultative capacity that assures attention by the policy and decision-making bodies.

(ii) The agency or association publishes or otherwise makes publicly available:

(A) The standards by which institutions or programs are evaluated;

(B) The procedures utilized in arriving at decisions regarding the accreditation status of an institution or program;

(C) The current accreditation status of institutions or programs and the date of the next currently scheduled review or reconsideration of accreditation;

(D) The names and affiliations of members of its policy and decision-making bodies, and the name(s) of its principal administrative personnel;

(E) A description of the ownership, control and type of legal organization of the agency or association.

(iii) The agency or association provides advance notice of proposed or revised standards to all persons, institutions, and organizations significantly affected by its accrediting process, and provides such persons, institutions and organizations adequate opportunity to comment on such standards prior to their adoption.

(iv) The agency or association has written procedures for the review of complaints pertaining to institutional or program quality, as these relate to the agency's standards and demonstrates that such procedures are adequate to provide timely treatment of such complaints in a manner that is fair and equitable to the complainant and to the institution or program.

(3) It assures due process in its accrediting procedures, as demonstrated in part by:

(i) Affording initial evaluation of the institutions or programs only when the chief executive officer of the institution applies for accreditation of the institution or any of its programs;

(ii) Providing for adequate discussion during an on-site visit between the visiting team and the faculty, administrative staff, students, and other appropriate persons;

(iii) Furnishing, as a result of an evaluation visit, a written report to the institution or program commenting on areas of strengths, areas needing improvement and, when appropriate, suggesting means of improvement and including specific areas, if any, where the institution or program may not be in compliance with the agency's standards;

(iv) Providing the chief executive officer of the institution or program with an opportunity to comment upon the written report and to file supplemental materials pertinent to the facts and conclusions in the written report of the visiting team before the accrediting agency or association takes action on the report:

(v) Evaluating, when appropriate, the report of the visiting team in the presence of a member of the team, preferably the chairman;

(vi) Providing for the withdrawal of accreditation only for cause, after review, or when the institution or program does not permit reevaluation, after due notice;

(vii) Providing the chief executive officer of the institution with a specific statement of reasons for any adverse accrediting action, and notice of the right to appeal such action;

(viii) Establishing and implementing published rules of procedures regarding appeals which will provide for:
(A) No change in the accreditation status of the institution or program pending disposition of an appeal;
(B) Right to a hearing before the appeal body;
(C) Supplying the chief executive officer of the institution with a written decision of the appeal body, including a statement of specifics.

(4) It has demonstrated capability and willingness to foster ethical practices among the institutions or programs which it accredits, including equitable student tuition refunds and nondiscriminatory practices in

admissions and employment.

(5) It maintains a program of evaluation of its educational standards designed to assess their validity and reliability.

(6) It secures sufficient qualitative information regarding the institution or program which shows an on-going program of evaluation of outputs consistent with the educational goals of the institution or program.

(7) It encourages experimental and innovative programs to the extent that these are conceived and implemented in a manner which ensures the quality and integrity of the institution or program.

(8) It accredits only those institutions or programs which meet its published standards, and demonstrates that its standards, policies, and procedures are fairly applied and that its evaluations are conducted and decisions rendered under conditions that assure an impartial and objective judgment.

(9) It reevaluates at reasonable intervals institutions or programs which it has accredited.

(10) It requires that any reference to its accreditation of accredited institutions and programs clearly specifies the areas and levels for which accreditation has been received.

(c) Reliability

(1) Acceptance throughout the United States of its policies, evaluation methods, and decisions by educators, educational institutions, licensing bodies, practitioners, and employers;

(2) Regular review of its standards, policies and procedures, in order that the evaluative process shall support constructive analysis, emphasize factors of critical importance, and reflect the educational and training needs of the student;

(3) Not less than two years' experience as an accrediting agency or association;

(4) Reflection in the composition of its policy and decision-making bodies of the community of interests directly affected by the scope of its accreditation.

(d) Autonomy

(1) It performs no function that would be inconsistent with the formation of an independent judgment of the quality of an educational program or institution;

(2) It provides in its operating procedures against conflict of interest in the rendering of its judgments and decisions.

APPENDIX B

IMPORTANCE OF ACCREDITING AGENCY CHARACTERISTICS

HOW IMPORTANT ARE THE FOLLOWING CHARACTERISTICS TO YOUR AGENCY'S EFFECTIVENESS IN MONITORING EDUCATIONAL QUALITY?

Please circle one number after each statement.

NOT APPLICABLE
OF NO IMPORTANCE
OF LOW IMPORTANCE
OF MODERATE IMPORTANCE
OF HIGH IMPORTANCE

SCOPE AND ORGANIZATION: THE CLARITY OF THE AGENCY'S PURPOSES, THE EFFECTIVENESS OF ITS ORGANIZATIONAL STRUCTURE, AND THE ADEQUACY OF ITS RESOURCES.

Percentages (N = 92)

		NA	1	2	3	4	5	6	7
020	The types and levels of institutions or programs accredited are clearly defined in published documents.			1	3		15	23	57
021	The agency's purposes and/or statutory authority are clearly stated and made publicly available.	1	1	1		7	13	21	56
005	The agency is the only accrediting or approval body for its purpose in its region.	13	3	7	11	1	9	8	48
070	The agency defines its own fiscal needs and controls its own budget.	2	2	3		6	10	23	53
071	External fiscal audits of the agency are performed regularly and financial statements are published.	10	3	3	8	11	16	16	32
072	The agency has the financial resources to carry out its activities effectively.				1	4	6	16	72
100	The agency's fees do not exceed the reasonable cost of sustaining and improving the accreditation process.	11	2	1	6	7	10	23	40
050	The staff is able to carry out the agency's activities with care and without undue delay.					2	9	19	70
102	The agency's fees are set according to a predetermined scheduled, such as one based on enrollment figures.	27	8	4	8	8	9	20	17
002	The scope of the agency's activities is neither too broad nor too limited in relation to the need for appropriate accrediting or approval services.		2	2	2	14	12	25	43

IMPORTANCE OF ACCREDITING AGENCY CHARACTERISTICS

HOW IMPORTANT ARE THE FOLLOWING CHARACTERISTICS TO YOUR AGENCY'S EFFECTIVENESS IN MONITORING EDUCATIONAL QUALITY?

Please circle one number after each statement.

		NOT APPLICABLE	OF NO IMPORTANCE	OF LOW IMPORTANCE		OF MODERATE IMPORTANCE			OF HIGH IMPORTANCE
	ACCREDITING PROCEDURES: THE SPECIFICITY OF THE AGENCY'S PROCEDURES AND THEIR PERTINENCE TO ITS PURPOSES.	NA	1	2	3	4	5	6	7
651	Institutions or programs are clearly informed of the nature and scope of their accreditation status.						8	16	76
041	The definitions of each level of accreditation or approval granted are clear and well-differentiated.	8		1	2	1	10	19	59
040	Procedures for granting, denying, withdrawing, or reinstating accredited status at all levels are clearly described.				2	4	3	18	72
054	Institutions or programs are regularly reviewed at reasonable intervals.	1				2	3	21	73
598	When circumstances warrant it, institutions or programs are reevaluated at intervals shorter than the normal cycle.	1	1		2	1	3	25	66
340	The decision-making process used to determine the status of an institution or program is published.	2		2		8	17	20	52
410	The first evaluation of an institution or program is initiated in response to an application from the chief executive officer of the institution.	2	4	1	7	7	8	15	56
284	Accreditation or approval by the agency assures that graduates are occupationally or professionally qualified for appropriate employment.	15	2	4	2	4	12	17	43
532	The agency's procedures allow programs or institutions freedom to use a variety of educational methods.					3	13	25	58
570	Institutions or programs are required to submit regular reports indicating a continuing program of self-evaluation.	5	3	1	4	6	12	20	47
220	Procedures are provided for the move from preaccreditation to full accreditation.	31	3		3	8	10	11	34
222	The agency provides both formal and informal consultations to preaccredited institutions to assist them in attaining full accreditation.	13		1	2	6	17	24	37

IMPORTANCE OF ACCREDITING AGENCY CHARACTERISTICS

HOW IMPORTANT ARE THE FOLLOWING CHARACTERISTICS TO YOUR AGENCY'S EFFECTIVENESS IN MONITORING EDUCATIONAL QUALITY?

Please circle one number after each statement.

		NOT APPLICABLE	OF NO IMPORTANCE	OF LOW IMPORTANCE		OF MODERATE IMPORTANCE		OF HIGH IMPORTANCE	
	EVALUATIVE PROCEDURES: THE COMPREHENSIVENESS AND CARE WITH WHICH INSTITUTIONS OR PROGRAMS ARE EVALUATED.	NA	1	2	3	4	5	6	7
240	A self-study and on-site review are required that provide for the qualitative assessment of an institution's or program's strengths and weaknesses.	2					2	7	89
128	Written instructions, guidance, and consultation are provided for the self-study and on-site visits.					2	5	18	75
261	Each institution or program is given a copy of the visiting team's report, which indicates strengths, weaknesses, and recommendations for improvement.	3				1		17	79
121	Procedures and/or criteria for the selection of visiting team members are clearly stated.	2	1	2	5	9	26	19	36
124	Institutions or programs to be evaluated may recommend or reject particular visiting team members.	10		5	10	14	24	11	27
260	Visiting teams are concerned with instruction, resources, management, and student services; all four areas are covered.	3	1		1	1	5	24	65
272	Visiting teams engage in discussions with faculty, administrators, and students.	1				1	2	14	82
603	The agency tempers its evaluative role so as not to endanger the reputation or the accreditation or approval status of its institutions or programs.	16	16	6	9	9	7	17	21
592	Training of visiting teams and monitoring their performance assures consistent application of standards.	2	1	1	1	7	16	33	39
172	The required qualifications and selection procedures for the agency's policy and decision-making bodies are prescribed.	3	2	1	2	11	17	21	42

IMPORTANCE OF ACCREDITING AGENCY CHARACTERISTICS

HOW IMPORTANT ARE THE FOLLOWING CHARACTERISTICS TO YOUR AGENCY'S EFFECTIVENESS IN MONITORING EDUCATIONAL QUALITY?

Please circle one number after each statement.

STANDARDS: THE CLARITY AND APPROPRIATENESS OF THE AGENCY'S STANDARDS AND THE CARE WITH WHICH IT DEVELOPS AND MAINTAINS THEM.

		NOT APPLICABLE	OF NO IMPORTANCE		OF LOW IMPORTANCE		OF MODERATE IMPORTANCE		OF HIGH IMPORTANCE
		NA	1	2	3	4	5	6	7
550	The agency evaluates the validity and reliability of its own educational standards.		1	2	6	5	17	24	46
572	The agency monitors continuing compliance with standards through regular reports submitted by institutions or programs.	2	1	3	3	5	17	24	45
552	The agency regularly reviews its standards, policies, and procedures by inviting suggestions from various interested groups.		1	1	2	3	15	33	45
380	Standards are not revised until after interested groups have had an opportunity to react to the proposed revisions.	1		2	1	5	8	19	64
382	An active program to improve accreditation standards or evaluative procedures (e.g., studies, conferences, workshops) is carried out.	2		2	5	3	15	38	35
411	The agency's standards are clear and detailed enough to assure fair and reliable treatment to institutions or programs.				2	1	10	23	64
556	The agency monitors educational standards to keep them consistent with occupational trends.	5	1		5	1	16	24	49
332	Institutions or programs are evaluated with respect to their own purposes rather than in comparison with others.	1	5		3	8	12	16	55
055	The agency publishes the standards by which institutions or programs are evaluated.						5	10	85
555	Standards are validated against the performance of graduates of accredited institutions, such as in licensure examinations.	20	2	6	6	10	19	19	18
642	Information regarding standards and guidelines for conduct of site visits is exchanged with other accrediting agencies.	9	8	5	9	21	18	20	10

IMPORTANCE OF ACCREDITING AGENCY CHARACTERISTICS

HOW IMPORTANT ARE THE FOLLOWING CHARACTERISTICS TO YOUR AGENCY'S EFFECTIVENESS IN MONITORING EDUCATIONAL QUALITY?

Please circle one number after each statement.

RESPONSIVENESS: THE SENSITIVITY OF THE AGENCY TO THE NEEDS AND DESIRES OF THE GROUPS IT AFFECTS, AND ITS READINESS TO RESPOND TO THEM.

		NOT APPLICABLE NA	OF NO IMPORTANCE 1	2	OF LOW IMPORTANCE 3	4	OF MODERATE IMPORTANCE 5	6	OF HIGH IMPORTANCE 7
283	The agency has public representatives on its policy-making bodies.	7	6	2	10	13	14	17	31
700	All significant, interested groups are represented on the agency's policy-making body.	7	3	2	10	9	18	14	37
350	Current accreditation statuses of institutions or programs and dates of the next scheduled review are available to the public.	3	2	3	6	8	14	20	44
281	Solicitation of the views of students is part of the accreditation or approval process.	1	1	2	2	6	14	26	47
282	Members of appropriate academic, occupational, or professional fields have a role in the accreditation or approval process.			1	2	2	7	19	69
270	Faculty members are given opportunities to make their views known to the agency.				1		9	31	59
390	Written procedures provide for fair and timely treatment by the agency of complaints against institutions or programs.		1		2	11	11	24	50
006	Most programs or institutions in its field or jurisdiction seek accreditation or approval from the agency.	7	4	3	9	10	12	14	41
360	The identities and affiliations of the members of policy and decision-making bodies are published.	1	4	2	10	8	10	19	46
580	Experimentation and innovation are encouraged.	1	4	1	1	4	20	29	40
370	A description of the agency's ownership, control, and type of legal organization is published or otherwise made publicly available.	2	2		6	15	11	20	44
110	The agency selects its personnel in accordance with nondiscriminatory practices.	1	4	1	6	9	10	17	53

IMPORTANCE OF ACCREDITING AGENCY CHARACTERISTICS

HOW IMPORTANT ARE THE FOLLOWING CHARACTERISTICS TO YOUR AGENCY'S EFFECTIVENESS IN MONITORING EDUCATIONAL QUALITY?

Please circle one number after each statement.

		NOT APPLICABLE	OF NO IMPORTANCE		OF LOW IMPORTANCE		OF MODERATE IMPORTANCE		OF HIGH IMPORTANCE
		NA	1	2	3	4	5	6	7
	DUE PROCESS: THE CARE WITH WHICH PROCEDURES ARE STRUCTURED AND CODIFIED TO AVOID UNFAIR OR CAPRICIOUS ACTIONS.								
441	The chief executive officer of the evaluated institution or program is given an opportunity to respond to the visiting team report.	2	1		1	1	7	15	73
450	At least one member of the visiting team is required to be present at the evaluation of the visiting team report.	14	10	1	17	6	6	12	35
460	Accreditation is withdrawn only after due process, for cause, and with due notice.	1	1				3	19	76
470	The agency reports the specific reasons for adverse decisions to the chief executive officer of the institution or program and offers an opportunity to appeal.		1			1	2	22	74
500	Adverse decisions are followed by a hearing at which representatives of the affected institution or program may appear.	6	1		2	7	9	18	58
484	Appeal procedures include safeguards against bias; e.g., no one involved in the original decision may serve on the appeal committee.	9	5	3	5	6	7	16	51
471	The agency has published rules of procedure regarding appeals.	2	3		2	6	6	11	70
490	An institution's or program's accreditation status cannot be changed by the agency while an appeal is pending.	3	3		2	3	11	16	61
510	Notification of specific reasons for an adverse action on an appeal is required.	3	1		1	2	9	17	67
590	The agency's published procedures are fairly applied; its actions are consistent with its procedures.	2				1	4	12	80

IMPORTANCE OF ACCREDITING AGENCY CHARACTERISTICS

HOW IMPORTANT ARE THE FOLLOWING CHARACTERISTICS TO YOUR AGENCY'S EFFECTIVENESS IN MONITORING EDUCATIONAL QUALITY?

Please circle one number after each statement.

		NOT APPLICABLE	OF NO IMPORTANCE	OF LOW IMPORTANCE		OF MODERATE IMPORTANCE		OF HIGH IMPORTANCE	
		NA	1	2	3	4	5	6	7
	AGENCY INTEGRITY: THE DEGREE OF TRUST ENGENDERED BY THE AGENCY THROUGH ITS RELIABILITY, AUTONOMY, AND CONCERN FOR ETHICAL PRACTICE.								
720	The agency is not constrained in its actions or decisions by ties to a parent or umbrella organization.	9	2	2		1	11	14	60
661	The agency's authority is broadly recognized by educational institutions, appropriate licensing agencies, and professional or occupational fields.	2	1	1	4	8	11	18	54
525	The agency denies candidacy and accreditation to institutions or programs it finds to be unethical in conduct.	5	1	2		2	7	25	58
520	The agency defines, fosters, and monitors ethical practices by institutions or programs with regard to such activities as recruiting and advertising.	10	1	4	1	8	17	18	41
710	The agency performs no function that interferes with the exercise of independent judgment about the educational quality of an institution.	2		2	2	2	7	18	66
064	A written policy or set of operating procedures clearly guards against conflicts of interest.	6		1	1	4	9	32	47
190	Visiting teams include at least one person who is not a member of the agency's policy-making body or administrative staff.	6	4	1	2	6	6	21	54
743	Members of the decision-making body do not participate in discussions or decisions affecting institutions with which they are affiliated.	3		3	1	2	7	14	69
593	Written procedures clearly assure that only qualified institutions or programs are accredited or approved.	1			1		3	22	72
591	The agency's decisions reflect fair and consistent application of its standards.		2				4	17	77
665	The agency is recognized by other accrediting agencies or by the Council on Postsecondary Accreditation.	12	10	7	6	14	8	9	34
526	Monitoring of institution or program practices in advertising, recruiting, student aid, or other areas is detailed enough to minimize abuses.	11		4	4	8	22	20	30
211	Concerns for institutional or program performance go beyond questions of educational quality into issues such as ethical practice and financial stability.	2	2	3	4	7	10	33	38
044	The agency ensures that institutions maintain sound educational control of off-campus or contracted programs.	14	2		2	1	8	27	46
342	The agency requires that applicants be given specified kinds of information about the institution or program, such as completion rates or employment rates of graduates.	20	8	3	9	9	9	21	21

COMPARATIVE IMPORTANCE OF THE GENERAL AREAS

The eighty specific agency characteristics you have just judged for absolute importance were grouped into seven broad areas of concern. Now we would like you to rank those seven general concerns, restated below, into their comparative order of importance in assuring that your agency will function effectively as a reliable authority with respect to the educational quality of the programs or institutions with which it is concerned. This will provide information about the broad concerns of accreditation, which may be imperfectly represented by the specific statements.

The ranking process is easiest if done in groups. First pick the two most important general areas of concern as applied to your agency, then order them and place a "1" and "2" as appropriate in the space beside each statement. Then pick the two least important concerns and mark them "6" and "7", recognizing that the rankings are relative, and the lowest ranked may still be quite important. Finally, rank the remaining three concerns from "3" to "5".

If an entire area of concern is not applicable to your agency, place it in one of the middle categories, with "NA" noted beside it rather than a rank. The two least important concerns should still be ranked "6" and "7".

	% 1's	%1's & 2's
SCOPE AND ORGANIZATION: The clarity of the agency's purposes, the effectiveness of its organizational structure, and the adequacy of its resources.	8.0	13.7
ACCREDITING PROCEDURES: The specificity of the agency's procedures and their pertinence to its purposes.	6.8	20.4
EVALUATIVE PROCEDURES: The comprehensiveness and care with which institutions or programs are evaluated.	27.3	55.7
STANDARDS: The clarity and appropriateness of the agency's standards and the care with which it develops and maintains them.	39.8	72.8
RESPONSIVENESS: The sensitivity of the agency to the needs and desires of the groups it affects, and its readiness to respond to them.	1.1	7.9
DUE PROCESS: The care with which procedures are structured and codified to avoid unfair or capricious actions.	1.1	6.8
AGENCY INTEGRITY: The degree of trust engendered by the agency through its reliability, autonomy, and concern for ethical practice.	17.0	22.7

Thank you for your judgments. They will help evaluate the current OE criteria for recognition. As noted earlier, you will be sent the results.

APPENDIX C

Mean Ranks of Comparative Importance

	Statement	Mean Rank[a]
120.	The agency employs competent, qualified prople as participants on visiting teams.	4.3
591.	The agency's decisions reflect fair and consistent application of its standards.	4.2
240.	A self-study and on-site review are required which provide for the qualitative assessment of a program's strengths and weaknesses.	4.1
610.	Some doubt exists as to whether the agency's procedures assure impartial and objective evaluations and decisions.	4.1
55.	The agency publishes the standards by which programs are evaluated.	4.0
40.	Procedures for granting, denying, withdrawing, or reinstating accredited status at all levels are clearly described.	4.0
335.	The standards by which the agency evaluates institutions have not been demonstrated to be valid or reliable.	4.0
254.	The agency does not provide sufficient preparation or instructions to the visiting teams.	3.8
661.	The agency's authority is broadly recognized by educational institutions, appropriate licensing agencies, and professional fields.	3.8
261.	Each institution is given a copy of the visiting team's report, which indicates strengths and weaknesses and makes recommendations for improvement.	3.6
213.	The agency's procedures for granting or denying accredited status are not clearly stated in its publications.	3.6
260.	Visiting teams are concerned with instruction, resources, management, and student services; all four areas are covered.	3.6
593.	Written procedures clearly assure that only qualified programs are approved.	3.6

	Statement	Mean Rank[a]
253.	The suggested structure of the self-study does not assure a sufficiently critical or analytic assessment of the strengths and weaknesses of the institutions.	3.5
128.	Written instructions, guidance, and consultation are provided for the self-study and on-site visits.	3.5
54.	Programs are regularly reviewed at reasonable intervals.	3.4
552.	The agency regularly reviews its standards, policies, and procedures by inviting suggestions from various interested groups.	3.4
470.	The agency reports the specific reasons for adverse decisions to the director of the program and offers an opportunity to appeal.	3.4
208.	The agency's procedures for withdrawing or revoking approval statuses and/or for reinstating programs are not clear.	3.3
460.	Accreditation is withdrawn only after due process, for cause, and with due notice.	3.3
576.	The agency's procedures for observing a program's evaluation of its outputs are not clear.	3.2
21.	The agency's purposes are clearly stated and made publicly available.	3.1
129.	The agency prepares visiting team members through workshops, training sessions or similar activities.	3.1
382.	An active program to improve approval or evaluative procedures (e.g., studies, conferences, workshops) is carried out.	3.1
41.	The definitions of each level of accreditation granted are clear and well differentiated.	3.0
64.	A written policy or set of operating procedures clearly guards against conflicts of interest.	3.0
20.	The types and levels of programs accredited are clearly defined in published documents.	3.0
488.	The agency does not have a defined process regarding appeals.	2.9

	Statement	Mean Rank[a]
710.	The agency performs no function inconsistent with making independent judgments about the educational quality of a program.	2.9
332.	Programs are evaluated with respect to their own purposes rather than in comparison with others.	2.9
441.	The director of the evaluated program is given an opportunity to respond to the visiting team report.	2.9
541.	The agency's standards of ethical practice are not clear with regard to matters such as recruiting and advertising.	2.8
50.	The staff is able to carry out the agency's activities with care and without undue delay.	2.8
500.	Adverse decisions are followed by a hearing at which representatives of the affected program may appear.	2.8
390.	Written procedures provide for fair and timely treatment by the agency of complaints against institutions.	2.8
471.	The agency has published rules of procedure regarding appeals.	2.8
380.	Standards are not revised until after interested groups have had an opportunity to react to the proposed revisions.	2.7
190.	Visiting teams include at least one person who is not a member of the agency's policy-making body or administrative staff.	2.7
520.	The agency defines, fosters, and monitors ethical practices by institutions with regard to such activities as recruiting and advertising.	2.7
570.	Programs are required to submit regular reports indicating a continuing program of self-evaluation.	2.6
350.	The current accreditation statuses of programs and the dates of the next scheduled review are available to the public.	2.5
450.	At least one member of the visiting team is required to be present at the evaluation of the visiting team report.	2.4

	Statement	Mean Rank[a]
283.	The agency has public represenatatives on its policy-making bodies.	2.2
580.	Experimentation and innovation by programs are encouraged.	2.2
490.	An institution's accreditation status cannot be changed by the agency while an appeal is pending.	2.2
78.	The agency's sources of revenue are made explicit.	2.1
640.	The agency maintains contact with counterpart agencies in other states.	2.1
410.	The first evaluation of an institution is initiated in response to an application from the chief executive officer of the institution.	2.0
100.	The agency's fees do not axceed the reasonable cost of sustaining and improving the accreditation process.	1.9
71.	External fiscal audits of the agency are performed regularly and financial statements are published.	1.9
91.	Information is too incomplete or ambiguous to determine the agency's financial strength.	1.7
15.	The agency's functions overlap with those of at least one other agency.	1.6
102.	The agency's fees are set according to a predetermined schedule, such as one based on enrollment figures.	1.5
52.	The organizational structure and staff size of the agency are published.	1.4

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[a] Because of the forced symmetrical nature of the responses from 1 to 5, the overall mean for 215 respondents was 2.95 with a standard deviation of .75.

APPENDIX D

CHANGES IN ACCREDITING AND APPROVAL

Which of the following changes have occurred in your agency since 1969? What were the time and origin of the change?

Please circle one number after every statement of change and an additional letter whenever 1, 2, or 3 was circled.

Percentages (N = 91)

		NO CHANGE	69-74	POST 74	CONTINUOUS	DUE TO OE	INDEPENDENT OF OE
		0	1	2	3	a	b
	STANDARDS						
1.	Standards became better defined, more explicit.	14	11	28	47	20	80
2.	Standards became so narrowly defined that they often miss important educational issues.	92	1	1	5	7	93
3.	Institutions increasingly saw our accrediting process as legalistic or heavy-handed.	75	5	14	7	48	52
4.	The agency became more systematic in its concern for the validity and reliability of its standards.	13	7	37	43	30	70
5.	The agency put into effect a continuing program of review dealing with substantive changes in institutions or programs.	33	12	27	28	21	79
6.	The agency's standards were strengthened.	18	2	28	52	24	76
7.	In applying standards, the emphasis shifted from the encouragement of improvement to the identification of weaknesses.	76	5	11	7	16	84
8.	Institutions or programs became increasingly critical of the way standards were being defined and applied.	74	6	9	9	19	81
	COMMUNICATION						
9.	The agency began publishing its policies and procedures or clarified their statements.	29	15	19	37	34	66
10.	The agency became aware of a need for better communication with federal and state agencies.	33	11	29	28	52	48
11.	Information sharing with other organizations through conferences, hearings, or workshops was increased.	23	6	36	35	33	67

Note: Figures are percentages based on 91 responses.

CHANGES IN ACCREDITING AND APPROVAL

Which of the following changes have occurred in your agency since 1969? What were the time and origin of the change?

Please circle one number after every statement of change and an additional letter whenever 1, 2, or 3 was circled.

		NO CHANGE 0	69-74 1	POST 74 2	CONTINUOUS 3	DUE TO OE a	INDEPENDENT OF OE b
	ORGANIZATION						
12.	The agency improved service to its field by broadening its scope.	45	11	29	15	19	81
13.	The agency's growth or extension of scope was curtailed.	90	4	7	0	29	71
14.	The burden imposed by OE requirements increased.	42	9	28	20	93	7
15.	The organizational structure of the agency was changed.	50	11	32	7	39	61
	RESPONSIVENESS						
16.	Procedures for dealing with complaints against institutions were improved.	23	14	46	18	54	46
17.	The burden of dealing with reactions by institutions, programs, or consumers to OE's requirements increased.	53	6	30	10	77	23
18.	Public representation was increased.	29	14	49	8	70	30
19.	The agency became more responsive to public concerns.	37	6	26	32	36	64
20.	The agency became more concerned with the ethical practices of institutions or programs.	44	10	24	22	35	65
21.	The importance given to developing policy regarding social issues grew.	53	7	23	18	36	64
22.	The agency's procedures were adapted to accommodate institutions or programs that depart from "standard" educational approaches.	43	10	25	22	16	84
23.	The increasing specificity of the agency's accreditation process began to stifle innovation.	93	1	5	0	13	87
24.	The agency became more responsive to the public demand for information potentially damaging to institutions or programs.	67	1	21	9	29	71
25.	The agency became more active in protecting the public against institutions or programs of poor quality.	47	7	18	29	14	86

CHANGES IN ACCREDITING AND APPROVAL

Which of the following changes have occurred in your agency since 1969? What were the time and origin of the change?

Please circle one number after every statement of change and an additional letter whenever 1, 2, or 3 was circled.

	NO CHANGE 0	69-74 1	POST 74 2	CONTINUOUS 3	DUE TO OE a	INDEPENDENT OF OE b
PROCEDURES						
26. Specific levels of accreditation were developed or clarified.	39	17	29	17	33	67
27. The agency's procedures became more systematic or standardized.	14	11	34	41	21	79
28. Procedures for on-site visits were improved.	11	9	37	43	24	76
29. Procedures for the self-study were improved or clarified.	2	9	48	41	33	67
30. An appeals procedure was instituted or improved.	26	19	40	15	46	54
31. The accrediting or approval procedure was depoliticized by virtue of the appeals process.	72	8	14	6	32	68
32. The agency became more credible because of its improved procedures.	37	2	23	38	20	80
33. The evaluative function of the agency became clearer to institutions or programs.	32	3	25	40	19	81
34. The time spent in reviewing each institution or program was increased.	46	7	32	15	20	80
35. Consultation with institutions or programs on review procedures was increased.	34	13	30	23	22	78
DEVELOPMENT						
36. The agency's role and purpose in accreditation or approval were clarified.	38	12	21	28	30	70
37. The agency has grown.	21	9	16	54	7	93
38. Planned changes came to be initiated more quickly.	47	1	35	17	25	75
39. The self-scrutiny required in applying for recognition strengthened the agency.	29	9	33	29	64	36
40. The agency's fees for accreditation increased.	31	8	43	17	17	83
41. The agency's higher fees began to prevent some schools or programs from seeking accreditation.	88	1	2	7	13	87
42. Because of the agency's connection with eligibility for federal funds, accreditation in effect became mandatory rather than voluntary.	67	11	9	12	61	39
43. The agency's functions were limited or reduced by OE's requirements.	92	2	3	2	27	73

APPENDIX E

SUGGESTIONS FOR MODIFYING THE RECOGNITION PROCESS

HOW CLOSELY DO THE FOLLOWING STATEMENTS REFLECT YOUR AGENCY'S CONCERNS FOR IMPROVING THE RECOGNITION PROCESS?

Please circle one number after each statement.

Percentages (N - 94)

RECOMMENDATIONS FOR ADDITIONAL GUIDANCE AND DISCLOSURE TO ACCREDITING AGENCIES	NO OPINION N/O	DISAGREE STRONGLY 1	2	DISAGREE 3	4	AGREE 5	6	AGREE STRONGLY 7
1. The Division of Eligibility and Agency Evaluation (DEAE) of the U.S. Office of Education (OE) should publish in detail its procedures for the evaluation of agencies.	5			1		18	5	71
2. DEAE should provide more information on how an agency will be affected by a particular recognition decision.	13	1		1	5	28	18	33
3. DEAE should provide agencies with a copy of the review summary presented by its staff to the Advisory Committee.	6				1	11	16	66
4. Procedures and criteria for selection of OE Advisory Committee members should be published.	8				5	25	21	41
5. The responsibilities of DEAE and of the OE Advisory Committee should be published.	7				5	23	15	51
6. DEAE should provide better directions to agencies for preparing petitions.	18		1	6	8	16	16	35
7. A timetable for submitting materials to DEAE should be provided to agencies.	6			2	8	30	16	37
8. DEAE should specify the kinds of evidence it considers acceptable for meeting each criterion.	4	1		1	4	10	19	61
9. The Commissioner's report should provide more detailed feedback on the reasons for the recognition decision.	13		1	2	4	21	21	38
10. Many criteria are vague, difficult to interpret, or their wording is too legalistic; their meanings should be made more explicit.	11	1	2	13	11	19	8	34

SUGGESTIONS FOR MODIFYING THE RECOGNITION PROCESS

HOW CLOSELY DO THE FOLLOWING STATEMENTS REFLECT YOUR AGENCY'S CONCERNS FOR IMPROVING THE RECOGNITION PROCESS?

Please circle one number after each statement.

		NO OPINION	DISAGREE STRONGLY		DISAGREE	AGREE		AGREE STRONGLY	
		N/O	1	2	3	4	5	6	7
	COMMENTS ON INEQUITIES OR INCONSISTENCIES IN THE RECOGNITION PROCEDURES								
11.	Most criteria refer to established agencies rather than to initial applicants.	43	6	1	12	8	21	1	7
12.	The large, powerful agencies receive preferential treatment from DEAE.	39	10	1	17	2	10	10	12
13.	The interpretation of the criteria by the Advisory Committee is not consistent from one year to the next.	48	1	1	7	7	16	11	10
14.	DEAE should be required to meet the criteria that agencies must meet.	11	1		8	8	23	12	37
15.	DEAE's due process procedures for accrediting and approval agencies are inadequate.	39		2	14	8	11	8	17
16.	Current procedures do not allow an adequate opportunity for agencies to respond to DEAE concerns.	26	1	5	25	7	13	5	18
17.	Hearing procedures for agencies should be structured to ensure that appropriate issues are covered.	8			1	2	31	23	35
18.	Agencies are not given sufficient time to prepare rebuttals to third party challenges.	48		1	10	6	13	2	20
19.	The Advisory Committee should read agency petitions in addition to DEAE staff summaries.	16	1	2	4	6	18	16	38
20.	An accrediting agency staff member should be present at the time of the agency's review by the Advisory Committee.	16			2	5	18	18	42
21.	Members of the Advisory Committee should have more direct experience with agencies.	28	1		2	10	21	15	24
22.	The Advisory Committee should have broader representation (professional, vocational, proprietary, etc.) to improve the quality of its evaluations.	29	2	1	1	7	18	16	26

SUGGESTIONS FOR MODIFYING THE RECOGNITION PROCESS

HOW CLOSELY DO THE FOLLOWING STATEMENTS REFLECT YOUR AGENCY'S CONCERNS FOR IMPROVING THE RECOGNITION PROCESS?

Please circle one number after each statement.

		NO OPINION	DISAGREE STRONGLY		DISAGREE		AGREE		AGREE STRONGLY
	SUGGESTIONS FOR CHANGES IN THE FUNCTIONS OR ROLE OF OE	N/O	1	2	3	4	5	6	7
23.	Ethical practices of agencies, however desirable, should not be a DEAE concern.	7	33	5	31	11	7	2	4
24.	Educational policy, such as promoting experimentation, should not be implemented through DEAE criteria.	17	9	4	18	7	20	10	16
25.	DEAE should hold open meetings to give agencies an opportunity to provide input on policy changes.	7		1	1	6	26	24	35
26.	The Advisory Committee should operate as a forum for issues in the overall field of accreditation.	24	10	5	11	6	17	15	13
27.	OE should publish comprehensive lists of unrecognized as well as recognized agencies.	16	24	4	22	5	17	5	8
28.	Information about changes in eligibility of postsecondary schools for federal and state programs, FTC cease and desist orders, restrictions imposed by the courts, and accrediting or approval actions should be more promptly and widely exchanged.	24	2	4	4	11	19	13	24
29.	OE should institute a program designed to improve the training of state education staff with respect to eligibility requirements, to gain their full cooperation in enforcing eligibility conditions.	32	6	2	7	5	21	10	17
30.	OE should award grants for research and contracts for services to accrediting agencies as one means by which to reflect its changing ideas of the public interest.	18	15	4	10	5	23	11	16
31.	Institutions receiving federal funds should be held legally accountable for the honesty and accuracy of the information they publish and disseminate about their educational programs and financial status.	6			1	8	17	14	54
32.	Studies should be conducted to estimate the numbers and kinds of degree and non-degree granting institutions that engage in specified malpractices.	28	4	2	7	7	22	11	18
33.	OE should require that agencies inform institutions and programs about the most common forms of misrepresentation.	15	11	6	11	10	18	8	22
34.	OE should permit the recognition of more than one accrediting agency in a geographic or educational area.	18	28	5	21	5	4	8	12

SUGGESTIONS FOR MODIFYING THE RECOGNITION PROCESS

HOW CLOSELY DO THE FOLLOWING STATEMENTS REFLECT YOUR AGENCY'S CONCERNS FOR IMPROVING THE RECOGNITION PROCESS?

Please circle one number after each statement.

ALTERNATIVES FOR RESTRUCTURING THE RECOGNITION PROCESS

	NO OPINION	DISAGREE STRONGLY		DISAGREE	AGREE			AGREE STRONGLY
	N/O	1	2	3	4	5	6	7
35. The federal government should provide research and planning grants to support non-traditional, experimental agencies seeking new modes and mechanisms of accreditation.	16	16	2	11	10	21	12	13
36. Institutional eligibility for public funds should not involve standards of educational quality; it should only be concerned with financial responsibility and public accountability.	6	46	14	19	1	7		6
37. An appeal body should be established to act as a final appellate body for agencies denied recognition; its responsibilities should be solely adjudicatory.	14	7	1	7	7	31	13	19
38. Due process should be preserved by delegating recognition to an independent body (COPA, for example) which would serve as a buffer against political pressures.	21	21	6	10	4	10	6	23
39. The review of an agency's operations should be delegated to a private body representing a broad range of postsecondary educational interests.	18	17	5	19	11	13	5	13
40. A national commission on institutional eligibility should be established and empowered to grant eligibility directly to unaccredited institutions.	23	37	7	18	2	5	2	5

SUGGESTIONS FOR MODIFYING THE RECOGNITION PROCESS

HOW CLOSELY DO THE FOLLOWING STATEMENTS REFLECT YOUR AGENCY'S CONCERNS FOR IMPROVING THE RECOGNITION PROCESS?

Please circle one number after each statement.

	NO OPINION	DISAGREE STRONGLY		DISAGREE		AGREE		AGREE STRONGLY
	N/O	1	2	3	4	5	6	7
ADDITIONS TO PRESENT CRITERIA								
DEAE should add new criteria to require agencies to:								
41. Verify data presented in an institution's self-study.	13	21	7	22	10	16	2	10
42. Cooperate with other accrediting agencies in scheduling joint visits when an institution so requests.	8	16	6	13	13	27	2	15
43. Provide educational support services to upgrade practices in the field.	16	24	4	15	10	19	7	6
44. Establish special procedures for evaluating off-campus programs.	24	11	4	17	5	19	7	13
45. Publish policies governing institutions' contractual relationships with nonaccredited organizations.	30	13	4	12	8	18	7	7
46. Monitor institutions or programs continuously rather than only after a period of years.	10	21	8	30	4	16	6	6
47. Certify all site-visit reports and file them with DEAE.	12	49	8	18	1	8		2
48. Gather more specific information concerning the background and integrity of the heads of institutions or programs.	13	42	11	24	2	1	1	5
49. Conduct periodic surprise audits.	16	46	8	19	4	4	2	1
DELETIONS FROM PRESENT CRITERIA								
DEAE should delete present criteria that require agencies to:								
50. Serve some identified need, as indicated by the absence of a competing agency.	28	22	6	20	2	10	2	10
51. Have public representatives on decision-making bodies.	12	22	8	22	4	18	2	12
52. Have a visiting team member present at the evaluation of the report.	11	17	6	18	9	13	9	17
53. Monitor institutions' affirmative action policies.	21	11	4	10	7	11	13	24
54. Foster ethical practices by institutions.	11	21	10	19	7	10	7	16
55. Encourage innovation.	8	22	12	25	6	8	6	12

OTHER SUGGESTIONS

If you would like to suggest additional modifications in the procedures or criteria of the recognition process, please write them on the back of this page.

APPENDIX F

ACCESSIBILITY TO OBSERVATION

HOW DEPENDENT IS EACH STATEMENT ON THE ASTUTENESS OF THE OBSERVER?

Please circle one number after each statement.

	SCOPE AND ORGANIZATION: THE CLARITY OF THE AGENCY'S PURPOSES, THE EFFECTIVENESS OF ITS ORGANIZATIONAL STRUCTURE, AND THE ADEQUACY OF ITS RESOURCES.	Median Rating	RARELY DETERMINABLE 1	REQUIRES ASTUTE JUDGMENT 2	REQUIRES SOME JUDGMENT 3	READILY APPARENT 4
			Percentages (N = 93)			
20	The types and levels of institutions or programs accredited are clearly defined in published documents.	3.94		1[a]	10	89
21	The agency's purposes and/or statutory authority are clearly stated and made publicly available.	3.92			13	87
5	The agency is the only accrediting or approval body for its purpose in its region.	3.77	4	2	25	69
70	The agency defines its own fiscal needs and controls its own budget.	3.34	2	8	48	42
72	The agency has the financial resources to carry out its activities effectively.	3.12	3	15	51	30
100	The agency's fees do not exceed the reasonable cost of sustaining and improving the accreditation process.	3.25	6	16	38	40
50	The staff is able to carry out the agency's activities with care and without undue delay.	3.12	2	23	40	35
2	The scope of the agency's activities is neither too broad nor too limited in relation to the need for appropriate accrediting or approval services.	2.57	9	39	33	20
102	The agency's fees for accreditation may prevent some schools from applying, especially newly developing institutions or programs.	2.57	23	24	40	13
--	The agency exists solely for purposes of determining eligibility for federal funding; it serves no other need.	2.35	28	26	28	18
--	The agency's accreditation or approval assures the expenditure of student and government moneys in an educationally effective and economically productive manner.	1.92	33	42	19	7

[a] Figures in these four columns are percentages based on 93 responses.

ACCESSIBILITY TO OBSERVATION

HOW DEPENDENT IS EACH STATEMENT ON THE ASTUTENESS OF THE OBSERVER?

Please circle one number after each statement.

ACCREDITING PROCEDURES: THE SPECIFICITY OF THE AGENCY'S PROCEDURES AND THEIR PERTINENCE TO ITS PURPOSES.

		Median Rating	RARELY DETERMINABLE 1	REQUIRES ASTUTE JUDGMENT 2	REQUIRES SOME JUDGMENT 3	READILY APPARENT 4
41	The definitions of each level of accreditation or approval granted are clear and well differentiated.	3.78		3	27	70
40	Procedures for granting, denying, withdrawing, or reinstating accredited status at all levels are clearly described.	3.78		2	28	70
508	When circumstances warrant it, institutions or programs are reevaluated at intervals shorter than the normal cycle.	3.52	1	11	37	51
284	Accreditation or approval by the agency assures that graduates are occupationally or professionally qualified for appropriate employment.	2.24	20	41	26	13
575	The agency's review of institutions' or programs' annual reports are not thorough enough to ensure that schools or programs adhere to standards.	2.12	23	43	29	4
582	The agency's procedures allow programs or institutions freedom to use a variety of educational methods.	3.27	3	15	41	41
570	Institutions or programs are required to submit regular reports indicating a continuing program of self-evaluation.	3.79	3	6	20	70
51	The agency's accrediting or approval procedures are timely and effective.	2.96	1	25	52	22
220	Procedures for the move from preaccreditation to full accreditation are provided and appropriately related.	3.52	1	13	35	51
222	The agency provides both formal and informal consultations to preaccredited institutions to assist them in attaining full accreditation.	3.49	2	6	43	49

ACCESSIBILITY TO OBSERVATION

HOW DEPENDENT IS EACH STATEMENT ON THE ASTUTENESS OF THE OBSERVER?

Please circle one number after each statement.

	EVALUATIVE PROCEDURES: THE COMPREHENSIVENESS AND CARE WITH WHICH INSTITUTIONS OR PROGRAMS ARE EVALUATED.	Median Rating	RARELY DETERMINABLE 1	REQUIRES ASTUTE JUDGMENT 2	REQUIRES SOME JUDGMENT 3	READILY APPARENT 4
240	A self-study and on-site review are required that provide for the qualitative assessment of an institution's or program's strengths and weaknesses.	3.69	1	11	26	62
261	Each institution or program is given a copy of the visiting team's report, which indicates strengths, weaknesses, and recommendations for improvement.	3.92	1		12	87
260	Visiting teams are concerned with instruction, resources, management, and student services; all four areas are covered.	3.66	1	7	33	59
272	Visiting teams engage in discussions with faculty, administrators, and students.	3.82	1	1	24	74
124	Institutions or programs to be evaluated may recommend or reject particular visiting team members.	3.81	5	8	15	73
603	The agency tempers its evaluative role so as not to endanger the reputation or the accreditation or approval status of its institutions or programs.	2.41	20	33	27	20
120	The agency uses competent, qualified people as participants on visiting teams.	3.19		18	47	35
592	Training of visiting teams and monitoring their performance assures consistent application of standards.	2.74	4	36	39	21
251	The reliability of the visiting team report is questionable.	2.00	28	44	24	3

ACCESSIBILITY TO OBSERVATION

HOW DEPENDENT IS EACH STATEMENT ON THE ASTUTENESS OF THE OBSERVER?

Please circle one number after each statement.

STANDARDS: THE CLARITY AND APPROPRIATENESS OF THE AGENCY'S STANDARDS AND THE CARE WITH WHICH IT DEVELOPS AND MAINTAINS THEM.

		Median Rating	RARELY DETERMINABLE 1	REQUIRES ASTUTE JUDGMENT 2	REQUIRES SOME JUDGMENT 3	READILY APPARENT 4
550	The agency evaluates the validity and reliability of its own educational standards.	2.86	11	30	25	34
334	The agency's evaluative program of its standards is weak, poorly conceived, or marginally effective.	2.11	21	48	24	7
572	The agency monitors continuing compliance with standards through regular reports submitted by institutions or programs.	3.65	3	8	30	59
552	The agency regularly reviews its standards, policies, and procedures by inviting suggestions from various interested groups.	3.61		6	38	56
380	Standards are not revised until after interested groups have had an opportunity to react to the proposed revisions.	3.72	2	3	30	64
382	An active program to improve accreditation standards or evaluative procedures (e.g., studies, conferences, workshops) is carried out.	3.40	1	8	46	46
411	The agency's standards are clear and detailed anough to assure fair and reliable treatment to institutions or programs.	3.08		29	37	35
556	The agency monitors educational standards to keep them consistent with occupational trends.	2.88	8	28	38	26
332	Institutions or programs are evaluated with respect to their own purposes rather than in comparison with others.	2.97	6	28	35	32
553	Standards are validated against the performance of graduates of accredited institutions, such as in licensure examinations.	2.82	15	23	39	24
642	Information regarding standards and guidelines for conduct of site visits is exchanged with other accrediting agencies.	3.57	15	3	28	54
335	Some of the agency's standards are questionable or not demonstrated to be valid or reliable.	1.96	24	58	11	8

ACCESSIBILITY TO OBSERVATION

HOW DEPENDENT IS EACH STATEMENT
ON THE ASTUTENESS OF THE
OBSERVER?

Please circle one number after each
statement.

	RESPONSIVENESS: THE SENSITIVITY OF THE AGENCY TO THE NEEDS AND DESIRES OF THE GROUPS IT AFFECTS, AND ITS READINESS TO RESPOND TO THEM.	Median Rating	RARELY DETERMINABLE 1	REQUIRES ASTUTE JUDGMENT 2	REQUIRES SOME JUDGMENT 3	READILY APPARENT 4
283	The agency has public representatives on its policy-making bodies.	3.89	7	1	9	82
700	All significant, interested groups are represented on the agency's policy-making body.	3.21	2	19	40	39
281	Solicitation of the views of students is part of the accreditation or approval process.	3.71	3	5	28	64
282	Members of appropriate academic, occupational, or professional fields have a role in the accreditation or approval process.	3.64		9	33	58
270	Faculty members are given opportunities to make their views known to the agency.	3.65		3	38	59
390	Written procedures provide for fair and timely treatment by the agency of complaints against institutions or programs.	3.69		2	36	62
561	The agency is sensitive to technological or other forms of educational advancement; new knowledge and skills are translated into educational criteria.	2.83	3	35	37	25
6	Most programs or institutions in its field or jurisdiction seek accreditation or approval from the agency.	3.58	4	8	34	55
18	Accreditation or approval by the agency is the only practicable and widespread national test of educational quality in its field.	3.00	13	24	27	37
580	Experimentation and innovation are encouraged.	2.96	4	28	41	28
110	The agency selects its personnel in accordance with nondiscriminatory practices.	3.54	3	9	35	52
--	The agency's public representatives have vested interests in the accrediting or approval body or its constituents.	2.30	28	28	33	12
400	The agency lacks procedures to adequately review complaints regarding institutional or programmatic malpractices (e.g., grade inflation, failure to grant tenure).	2.73	14	27	36	23

ACCESSIBILITY TO OBSERVATION

HOW DEPENDENT IS EACH STATEMENT ON THE ASTUTENESS OF THE OBSERVER?

Please circle one number after each statement.

DUE PROCESS: THE CARE WITH WHICH PROCEDURES ARE STRUCTURED AND CODIFIED TO AVOID UNFAIR OR CAPRICIOUS ACTIONS.

		Median Rating	RARELY DETERMINABLE 1	REQUIRES ASTUTE JUDGMENT 2	REQUIRES SOME JUDGMENT 3	READILY APPARENT 4
441	The chief executive officer of the evaluated institution or program is given an opportunity to respond to the visiting team report.	3.94	2	1	7	90
450	At least one member of the visiting team is required to be present at the evaluation of the visiting team report.	3.88	4	1	13	81
460	Accreditation is withdrawn only after due process, for cause, and with due notice.	3.76	1	2	29	67
500	Adverse decisions are followed by a hearing at which representatives of the affected institution or program may appear.	3.86	1	1	20	78
484	Appeal procedures include safeguards against bias; e.g., no one involved in the original decision may serve on the appeal committee.	3.70	4	2	31	62
590	The agency's published procedures are fairly applied; its actions are consistent with its procedures.	3.04	3	23	44	30
395	In reviewing complaints, the agency considers only substantially supported allegations that could impair institutional or program quality or effectiveness.	2.82	8	29	40	23
493	Although no specific policy or procedure is stated, it is implicit in the overall appeal procedures that the status of an institution or program cannot be changed while an appeal is pending.	3.38	7	15	33	46
712	Through its structure and procedures the agency eliminates politically-based decisions that may adversely affect the quality of education.	2.45	16	36	23	26

ACCESSIBILITY TO OBSERVATION

HOW DEPENDENT IS EACH STATEMENT ON THE ASTUTENESS OF THE OBSERVER?

Please circle one number after each statement.

AGENCY INTEGRITY: THE DEGREE OF TRUST ENGENDERED BY THE AGENCY THROUGH ITS RELIABILITY, AUTONOMY, AND CONCERN FOR ETHICAL PRACTICE.

		Median Rating	RARELY DETERMINABLE 1	REQUIRES ASTUTE JUDGMENT 2	REQUIRES SOME JUDGMENT 3	READILY APPARENT 4
720	The agency is not constrained in its actions or decisions by ties to a parent or umbrella organization.	3.12	3	20	43	33
661	The agency's authority is broadly recognized by educational institutions, appropriate licensing agencies, and professional or occupational fields.	3.52	2	19	28	51
525	The agency denies candidacy and accreditation to institutions or programs it finds to be unethical in conduct.	3.16	5	22	36	38
520	The agency defines, fosters, and monitors ethical practices by institutions or programs with regard to such activities as recruiting and advertising.	3.01	10	15	49	26
728	The accreditation or approval conferred by an agency has been distorted by political expediency.	1.84	35	43	17	5
710	The agency performs no function that interferes with the exercise of independent judgment about the educational quality of an institution.	2.85	3	37	29	31
64	A written policy or set of operating procedures clearly guards against conflicts of interest.	3.39	3	15	35	46
113	Accreditation or approval represents judgments of qualified personnel; accreditation is technically reliable.	3.04		27	42	30
593	Written procedures clearly assure that only qualified institutions or programs are accredited or approved.	3.19		22	41	37
591	The agency's decisions reflect fair and consistent application of its standards.	2.87	4	32	38	26
743	Members of the decision-making body do not participate in discussions or decisions affecting institutions with which they are affiliated.	3.70	3	9	25	63
526	Monitoring of institution or program practices in advertising, recruiting, student aid, or other areas is detailed enough to minimize abuses.	2.80	6	32	42	21
538	The agency fails to monitor the fraudulent use of student aid funds by institutions or programs.	2.11	26	39	20	14
211	Concerns for institutional or program performance go beyond questions of educational quality into issues such as ethical practice and financial stability.	2.83	7	31	38	25
--	Accreditation or approval by the agency is not a reliable indicator of either institutional integrity or viability.	1.97	28	46	18	8
44	The agency ensures that institutions maintain sound educational control of off-campus or contracted programs.	2.70	5	37	42	17

FORM APPROVED
O.M.B. NO. 51-579003

APPENDIX G

EVALUATION OF OE CRITERIA FOR RECOGNITION OF ACCREDITING AND STATE APPROVAL AGENCIES

External Validation of Office of Education Judgments

For each hypothetical composite agency described on the following pages:

(A) Indicate whether you think the agency should be recognized, and for what period, or should be denied recognition.

Four-year recognition should be awarded when there are no deficiencies, or only very minor ones, that would interfere with the agency's functioning.

Three-year recognition should be awarded when the agency shows minor deficiencies that do not seriously interfere with its functioning and seem quite likely to be corrected.

Two-year recognition indicates that deficiencies are not quite so minor and there is some doubt as to their potential for correction.

One-year recognition should be awarded when the deficiencies are more serious or more numerous, or when you have greater doubt as to their potential for correction.

Recognition should be denied when the deficiencies lead you to seriously doubt the agency's ability to function as a reliable arbiter of educational quality.

Even though the information about each agency is quite limited, please make the best judgment you can, circling only one of the alternatives.

(B) Indicate which pieces of information about the agency were most critical in influencing your judgment.

(C) Jot down the kinds of additional information you would have liked in making your decision.

Complete all three steps for one agency before going on to the next.

On the last page you will be asked to rank the 12 agencies, following directions on that page.

Educational Testing Service
Berkeley, California
January, 1979

This study is authorized by law (20 USC 1226). While you are not required to respond, your cooperation is needed to make the results of this study comprehensive, accurate, and timely. All information which would permit identification of the individual will be strictly protected, will be used only by persons engaged in and for the purposes of the survey, and will not be disclosed or released to others for any purposes.

A. AFTER READING THE DESCRIPTION OF THE HYPOTHETICAL AGENCY BELOW, INDICATE YOUR JUDGMENT OF THE NUMBER OF YEARS THE AGENCY SHOULD BE RECOGNIZED.

Circle one of the 5 alternatives to the right: 4 YRS. 3 YRS. 2 YRS. 1 YR. DENY RECOGNITION (0)

The Advisory Board on Opthalmology*

B. EACH NUMBER IN THE COLUMN TO THE LEFT OF THE DESCRIPTION CORRESPONDS TO ONE CHARACTERISTIC OF THE HYPOTHETICAL AGENCY.

Circle no more than five of the numbers, to indicate those factors that most influenced your judgment in A above.

01 is petitioning the Office of Education for renewal of recognition.
02 For over 10 years it has approved
03 baccalaureate and graduate programs in opthalmology
04 throughout the United States.
05 The Board is assisted financially by the American Advisory Council on Eye Care, its parent organization.

06 Its policy/decision-making body is made up of competent and qualified members, and
07 its advisory council includes public representatives.
08 The decision-making body does not appear to meet frequently enough to function effectively.

09 The decision-making process used to determine a program's status is published, but
10 the agency grants a probation status that is not defined in its published documents.
11 The Board undertakes studies and sponsors conferences to improve its approval standards,
12 which are clear and detailed enough to assure that programs are treated fairly.

13 In addition, the Board provides written procedures that assure its fair and timely treatment of complaints against programs by students and others. It monitors programs'
14 ethical practices with regard to advertising and recruiting practices and
15 also with regard to equitable refund policies.
16 When circumstances warrant it, programs are reevaluated more frequently than usual.

---

*Any resemblance in the names of the hypothetical agencies to any actual organization is coincidental and not intended.

17 The Board's site-visit procedures have been improved over the years.

18 Current procedures require that visiting teams include at least one person who is not a member of the administrative staff or policy/decision-making body.

19 At least one member of the visiting team is required to be present at the Board's evaluation of their report.

20 Before this evaluation, programs are given an opportunity to identify errors in the report and to submit supplemental materials.

C. WHAT ADDITIONAL FACTUAL INFORMATION ABOUT THIS AGENCY WOULD YOU HAVE FOUND USEFUL IN MAKING YOUR DECISION?

Please indicate below.

A. AFTER READING THE DESCRIPTION OF THE HYPOTHETICAL AGENCY BELOW, INDICATE YOUR JUDGMENT OF THE NUMBER OF YEARS THE AGENCY SHOULD BE RECOGNIZED.

Circle one of the 5 alternatives to the right: 4 YRS. 3 YRS. 2 YRS. 1 YR. DENY RECOGNITION (0)

The American Council on Internal Medicine

B. EACH NUMBER IN THE COLUMN TO THE LEFT OF THE DESCRIPTION CORRESPONDS TO ONE CHARACTERISTIC OF THE HYPOTHETICAL AGENCY.

Circle no more than five of the numbers, to indicate those factors that most influenced your judgment in A above.

01 approves programs at all levels in this branch of medicine.
02 It is applying for renewal of its recognition after
03 having approved programs for about 10 years.
04 The petition submitted by the Council described the organizational structure and staff size, and
05 indicated that the agency has the financial resources to carry out its activities effectively.
06 The Council defines its own fiscal needs and controls its own budget.

07 An umbrella organization appoints all members of the policy/decision-making body;
08 a broad spectrum of educators and physicians is represented.
09 The policy/decision-making body is autonomous and its decisions are final.
10 Those members of the policy/decision-making body who have participated in the evaluation of a particular program do not vote on an approval decision for that program.

11 Appeals procedures are defined and implemented by the umbrella organization.
12 Adverse approval decisions may be followed by an appeals hearing at which representatives of the affected program may appear.

13 During on-site visits, visiting teams engage in discussions with faculty, administrators, and students.
14 They ensure that the approval process includes the views of students.
15 Guidance, either through written instructions or consultation, is provided for the self-study and on-site visit.
16 The Council's criteria and procedures for awarding preaccreditation status are appropriately related to those applied for awarding full approval status.

17 Each program appraises the accomplishment of its own stated objectives,

18 and the agency monitors, through regularly submitted reports, the program's continuing compliance with the Council's standards.

19 The agency publishes the standards by which programs are evaluated, and,

20 in addition, maintains a program to evaluate the validity and reliability of these standards.

21 The Council defines and monitors ethical practices by programs with regard to refunding tuition and fees, placing graduates, and providing transcripts.

22 Its own personnel are selected in accordance with nondiscriminatory practices.

C. WHAT ADDITIONAL FACTUAL INFORMATION ABOUT THIS AGENCY WOULD YOU HAVE FOUND USEFUL IN MAKING YOUR DECISION?

Please indicate below.

A. AFTER READING THE DESCRIPTION OF THE HYPOTHETICAL AGENCY BELOW, INDICATE YOUR JUDGMENT OF THE NUMBER OF YEARS THE AGENCY SHOULD BE RECOGNIZED.

Circle one of the 5 alternatives to the right: 4 YRS. 3 YRS. 2 YRS. 1 YR. DENY RECOGNITION (0)

The American Council of Registered Tax Consultants

B. EACH NUMBER IN THE COLUMN TO THE LEFT OF THE DESCRIPTION CORRESPONDS TO ONE CHARACTERISTIC OF THE HYPOTHETICAL AGENCY.

Circle no more than five of the numbers, to indicate those factors that most influenced your judgment in A above.

01 has accredited programs for nearly twenty years.

02 Only graduates from programs it accredits are eligible for admission to certifying examinations.

03 The Council is petitioning the Office of Education for renewal of recognition.

04 The petition it submitted described the number of applications for accreditation it processed in each of the last 5 years.

05 and gave a detailed account of its sources of revenue.

06 The agency selects its personnel in accordance with nondiscriminatory practices, but

07 information it provided regarding commitment of personnel time to accrediting activities suggests that the agency may be understaffed.

08 Moreover, the agency's relationship with the American Association of Tax Consultants, its parent organization, raises questions about the autonomy of the Council.

09 The agency approves only programs that are located in regionally accredited institutions,

10 and monitors the compliance of these programs with its standards through reports which approved programs must submit regularly.

11 When a program fails to meet the Council's standards, the agency has standardized procedures for withdrawal of approval.

12 Ethical practices, however, are monitored at the institutional level by regional accrediting agencies, rather than by the Council itself.

13 The agency provides written instructions and makes consultative services available to programs before self-studies are begun.

14 These resources are also available to programs and visiting team members in preparation for on-site visits.

15 The agency structures self-studies by providing a questionnaire that programs must complete.

16 However, an examination of the self-study questionnaire indicates that students are not involved in this phase of the approval process.

17 The agency listed detailed criteria for the selection of the visiting team members.

18 Programs may recommend or reject particular team members prior to the on-site visit.

19 DEAE staff observed one on-site visit and noted that the visiting team sought input from all appropriate groups.

20 The agency has published rules of procedure regarding appeals,

21 stating that if a decision is made not to approve a program, representatives of that program may appear at an appeals hearing.

22 The agency publishes the standards by which it evaluates programs,

23 but it did not provide information about its methods of assessing the reliability and validity of those standards.

24 Although programs are given advance notice of proposed changes in standards, there seems to be no set procedure for them to comment on the changes before they are implemented.

C. WHAT ADDITIONAL FACTUAL INFORMATION ABOUT THIS AGENCY WOULD YOU HAVE FOUND USEFUL IN MAKING YOUR DECISION?

Please indicate below.

A. AFTER READING THE DESCRIPTION OF THE HYPOTHETICAL AGENCY BELOW, INDICATE YOUR JUDGMENT OF THE NUMBER OF YEARS THE AGENCY SHOULD BE RECOGNIZED.

Circle one of the 5 alternatives to the right.   4 YRS.   3 YRS.   2 YRS.   1 YR.   DENY RECOGNITION (0)

The American Federation of Speech Pathologists

B. EACH NUMBER IN THE COLUMN TO THE LEFT OF THE DESCRIPTION CORRESPONDS TO ONE CHARACTERISTIC OF THE HYPOTHETICAL AGENCY.

Circle no more than five of the numbers, to indicate those factors that most influenced your judgment in A above.

01 has been accrediting B.A. and graduate level programs
02 for over 10 years.
03 It is petitioning the Office of Education for renewal of recognition.

04 Assisted by an umbrella organization, the agency has the
05 financial resources to carry out its activities effectively.

06 Each of the Federation's levels of program approval is clear and well-differentiated.
07 It does not, however, publish information about one of its approval statuses.

08 During site visits, visiting teams talk with faculty, administrators, and students.
09 After their visit they provide the program with a written report discussing its strengths and weaknesses and making recommendations for improvements.
10 It should be noted that site visit procedures have been revised within the past few years.
11 Should a program appeal an adverse approval decision, the Federation cannot change its status while the appeal is pending.

12 The Federation reviews its standards, policies and procedures by inviting suggestions from various interested groups.
13 Furthermore, standards are not revised until these groups have had an opportunity to react to proposed revisions.

14 The agency's actions are consistent with its published procedures.
15 For instance, programs are evaluated at intervals shorter than the normal cycle when circumstances warrant it.

16 Ethical practices by programs are fostered and monitored in
several areas:
16 recruiting and advertising practices, and
17 placement of graduates in appropriate employment.

18 Members of the profession have a role in the approval process,
19 as does the public. Public representatives serve on all of the
agency's advisory councils.
20 It should be noted that the agency's policy/decision-making
body convenes too infrequently to function effectively.

C. WHAT ADDITIONAL FACTUAL INFORMATION ABOUT THIS AGENCY WOULD YOU HAVE FOUND USEFUL IN MAKING YOUR DECISION?

Please indicate below.

A. AFTER READING THE DESCRIPTION OF THE HYPOTHETICAL AGENCY BELOW, INDICATE YOUR JUDGMENT OF THE NUMBER OF YEARS THE AGENCY SHOULD BE RECOGNIZED.

Circle one of the 5 alternatives to the right: 4 YRS. 3 YRS. 2 YRS. 1 YR. DENY RECOGNITION (0)

B. EACH NUMBER IN THE COLUMN TO THE LEFT OF THE DESCRIPTION CORRESPONDS TO ONE CHARACTERISTIC OF THE HYPOTHETICAL AGENCY.

Circle no more than five of the numbers, to indicate those factors that most influenced your judgment in A above.

The Association for the Advancement of Automobile Technology

01 is petitioning the Office of Education for renewal of recognition.
02 It has approved programs at the A.A. and B.A. level
03 for about 10 years.
04 It clearly defines types and levels of programs eligible for accreditation in its Accreditation Manual, and
05 only graduates from programs it approves are eligible for employment in the field.

06 The petition submitted described the agency's annual volume of work.
07 It also provided information regarding staff qualifications, which suggests that
08 the Association may be inadequately staffed. There is
09 some doubt as to whether the agency functions independently of the Society of Automotive Engineers, the parent organization with which it is affiliated. The agency does, however,
10 have public representatives on its policy/decision-making body,
11 and it selects all members of these bodies, as well as visiting team members and consultants, in accordance with nondiscriminatory practices.

12 Only programs located in regionally accredited institutions are eligible for approval.
13 Approved programs are reviewed at reasonable intervals, and
14 their compliance with the agency's standards is ensured by the frequent reports they submit to the Association.
15 Although programs are given advance notice of changes in standards, they are not given an opportunity to comment on the proposed changes.
16 In addition, it is not clear that the agency has an effective method for assessing the reliability or validity of its standards.
17 When a program fails to meet its standards, the agency has procedures for withdrawal of approval.
18 Ethical practices, however, are monitored at the institutional level by regional accrediting agencies, rather than by the Association.

19 Programs are required to complete one of two alternate questionnaires provided by the agency for conducting their self-studies.

20 Nowhere is there an explicit requirement, however, that either faculty or students be involved in the self-study.

21 The agency described procedures for the selection of visiting team members

22 that allow programs to recommend or reject particular team members prior to the on-site visit.

23 The DEAE staff member who observed one on-site visit noted that the visiting team talked with all appropriate groups.

24 The agency has detailed procedures and criteria for withdrawing approval, and does so only after notifying the program.

25 Moreover, the agency gives the program specific reasons for any adverse decisions it may make regarding the program's appeal.

C. WHAT ADDITIONAL FACTUAL INFORMATION ABOUT THIS AGENCY WOULD YOU/HAVE FOUND USEFUL IN MAKING YOUR DECISION?

Please indicate below.

A. AFTER READING THE DESCRIPTION OF THE HYPOTHETICAL AGENCY BELOW, INDICATE YOUR JUDGMENT OF THE NUMBER OF YEARS THE AGENCY SHOULD BE RECOGNIZED.

Circle one of the 5 alternatives to the right: 4 YRS. 3 YRS. 2 YRS. 1 YR. DENY RECOGNITION (0)

The Association of Campuses Without Walls

B. EACH NUMBER IN THE COLUMN TO THE LEFT OF THE DESCRIPTION CORRESPONDS TO ONE CHARACTERISTIC OF THE HYPOTHETICAL AGENCY.

Circle no more than five of the numbers, to indicate those factors that most influenced your judgment in A above.

01 accredits postsecondary institutions that offer an alternative
to the traditional college curriculum.
02 It has been accrediting nontraditional institutions for the
past five years, and
03 is petitioning the Office of Education for initial recognition.

04 The Association is a non-profit educational organization, with
05 an annual budget for accrediting activities of under $25,000.
06 There is evidence that suggests that agency staffing may be
inadequate for its workload.
07 It does reevaluate institutions every 5 to 7 years, although
08 it does not appear to include dates of next scheduled reviews
in its publications.

09 The types and levels of institutions the agency accredits are
clearly defined in its published documents.
10 The Association describes accreditation statuses that are not
equivalent to the preaccreditation status defined by the
Office of Education.
11 It publishes the decision-making process it uses to determine
the status of institutions.
12 Published procedures include the safeguard that an institution's
status cannot be changed by the agency while an appeal is
pending.
13 but it is unclear that an institution may appeal an adverse
decision.

Examples of institutional self-studies suggest that the
14 agency's self-study procedures are deficient in that they do
not provide for sufficiently critical assessment of
institutions' strengths and weaknesses,
15 or for an assessment of the accomplishment of institutional
goals.

16 The Association has no written policy regarding the selection
of visiting team members.
17 It has, however, provided documents indicating the qualifications of the current team members.

18 Visiting teams include at least one person who is not a member of the agency's policy/decision-making body or administrative staff.

19 Several constituencies are underrepresented on the agency's policy/decision-making body.

20 For instance, the agency does not provide for public representation on that body.

21 Furthermore some doubt exists as to whether the agency ensures impartial and objective evaluations and decisions.

22 No formal procedures exist for institutions to comment on revisions of standards prior to their adoption.

23 Evidence of the agency's acceptance by colleges in its domain is questionable;

24 some have complained that the agency is not serving their needs.

25 Information about the agency's effectiveness in assessing the reliability and validity of its standards is inconclusive, and

26 it appears that the Association does not maintain an active program to evaluate the reliability and validity of its standards.

27 With respect to ethical practices, the agency's standards are not clear in the areas of nondiscriminatory admissions policies and equitable tuition refunds.

C. WHAT ADDITIONAL FACTUAL INFORMATION ABOUT THIS AGENCY WOULD YOU HAVE FOUND USEFUL IN MAKING YOUR DECISION?

Please indicate below.

A. AFTER READING THE DESCRIPTION OF THE HYPOTHETICAL AGENCY BELOW, INDICATE YOUR JUDGMENT OF THE NUMBER OF YEARS THE AGENCY SHOULD BE RECOGNIZED.

Circle one of the 5 alternatives to the right: 4 YRS. 3 YRS. 2 YRS. 1 YR. DENY RECOGNITION (0)

Committee on Research in Medical Technology

B. EACH NUMBER IN THE COLUMN TO THE LEFT OF THE DESCRIPTION CORRESPONDS TO ONE CHARACTERISTIC OF THE HYPOTHETICAL AGENCY.

Circle no more than five of the numbers, to indicate those factors that most influenced your judgment in A above.

01 has approved programs at all levels in this medical field
for more than 20 years. Its petition
02 for renewal of recognition indicates that
03 its primary function is accreditation, and
04 that it defines its own fiscal needs and controls
its own budget although it is
05 assisted financially by an umbrella organization.
06 The petition also lists the qualifications and selection
procedures prescribed by the Committee for its governing
board members.

07 To be eligible for approval, a program must be located in
an institution that has been accredited by a recognized
agency other than the Committee.

08 The Committee does not have a preaccreditation status,
but it does have a provisional status.
09 The agency requires a program seeking provisional status
to complete a self-study and to undergo evaluation by a
visiting team. The Committee's petition states that
10 its self-study and site visit procedures, as well as
11 its standards have been revised or refined, and
provides information about
12 its standards' development process. Thus, programs to be
13 evaluated may recommend or reject particular visiting
team members, and
14 when circumstances warrant it, the agency will reevaluate
programs at intervals shorter than the normal cycle.
15 Solicitation of the views of students has become part of
the approval process.

16 Members of the umbrella organization provide consulting
services to programs.
17 The agency maintains a list of these outside consultants,
18 and it takes the public interest into account by including
public representatives on all agency committees.

19 The Committee has published rules of procedure regarding appeals, and it

20 prohibits the changing of a program's status while an appeal is pending.

21 The agency has also published a statement affirming adherence to ethical practices and it also requires programs to do so.

22 Its standards are clear and detailed enough to ensure fair and reliable treatment to all programs.

23 Besides requiring programs to gather information on program graduates, the Committee

24 maintains a program to evaluate the validity and reliability of its own educational standards.

25 Letters submitted with the petition indicate that the agency is recognized by other recognized accrediting agencies and by the Council on Postsecondary Accreditation.

C. WHAT ADDITIONAL FACTUAL INFORMATION ABOUT THIS AGENCY WOULD YOU HAVE FOUND USEFUL IN MAKING YOUR DECISION?

Please indicate below.

A. AFTER READING THE DESCRIPTION OF THE HYPOTHETICAL AGENCY BELOW, INDICATE YOUR JUDGMENT OF THE NUMBER OF YEARS THE AGENCY SHOULD BE RECOGNIZED.

Circle one of the 5 alternatives to the right: 4 YRS. 3 YRS. 2 YRS. 1 YR. DENY RECOGNITION (0)

The Council on Corporate Administration

B. EACH NUMBER IN THE COLUMN TO THE LEFT OF THE DESCRIPTION CORRESPONDS TO ONE CHARACTERISTIC OF THE HYPOTHETICAL AGENCY.

Circle no more than five of the numbers, to indicate those factors that most influenced your judgment in A above.

01 accredits business-oriented institutions at all postsecondary levels.

02 It has been accrediting institutions for less than five years,

03 and is petitioning the Office of Education for initial recognition.

04 The petition indicated that the Council is adequately staffed for its effective functioning.

05 Its fiscal needs are self-defined and its budget is self-controlled.

06 A parent organization appoints all members of CCA's advisory board.

07 All significant constituencies are represented on the agency's policy/decision-making body,

08 including a wide range of educators and business people.

09 The policy/decision-making body is autonomous and its decisions are final.

10 The Council's personnel are selected in accordance with nondiscriminatory practices.

11 In addition to its other tasks the parent organization defines and implements the appeal procedures,

12 notifying institutions of the specific reasons for an adverse action on an appeal.

13 Members of the policy/decision-making body who evaluate a particular institution may not vote on the accrediting decision for that institution.

14 The Council's published procedures are fairly applied; its actions are consistent with its procedures.

15 Its definition of each level of accreditation is clear and well-differentiated.

16 Furthermore, its criteria and procedures for awarding preaccreditation status are appropriately related to those applied for awarding accredited status.

17 Each institution appraises the accomplishment of its stated objectives and

18 the agency monitors continuing compliance with its standards through regular reports submitted by the institution.

19 The Council maintains a program to evaluate the validity and reliability of its standards,

20 and revises them only after interested groups have had an opportunity to react to the proposed revisions.

21 Visiting team members are trained in workshops and similar activities,

22 and are instructed to include the views of students in the accreditation process.

23 The agency defines, fosters, and monitors institutions' ethical practices with regard to nondiscrimination in admissions and employment,

24 refuding tuition and fees, placing graduates, and providing transcripts.

C. WHAT ADDITIONAL FACTUAL INFORMATION ABOUT THIS AGENCY WOULD YOU HAVE FOUND USEFUL IN MAKING YOUR DECISION?

Please indicate below.

A. AFTER READING THE DESCRIPTION OF THE HYPOTHETICAL AGENCY BELOW, INDICATE YOUR JUDGMENT OF THE NUMBER OF YEARS THE AGENCY SHOULD BE RECOGNIZED.

Circle one of the 5 alternatives to the right: 4 YRS. 3 YRS. 2 YRS. 1 YR. DENY RECOGNITION (0)

The National Association of Counselors for the Elderly

B. EACH NUMBER IN THE COLUMN TO THE LEFT OF THE DESCRIPTION CORRESPONDS TO ONE CHARACTERISTIC OF THE HYPOTHETICAL AGENCY.

Circle no more than five of the numbers, to indicate those factors that most influenced your judgment in A above.

01 approves baccalaureate and graduate-degree level programs for
the training of counselors of older people. Programs usually
focus on gerontology, a developing area of the social sciences.
The Association has had
02 2 years' experience as an accrediting agency, and
03 recently submitted a documented petition for initial recognition by the Office of Education.

04 The agency's national scope is clearly defined, and its
supporting documents state that the Association is a
05 non-profit educational organization. A financial statement
06 provided by the agency specifies its annual budget for
accrediting activities as under $25,000.
Salary information indicates that there may be an
07 insufficient commitment of personnel time or inadequate
staffing to handle the work flow.

08 The Association's procedures ensure that the first evaluation
of a program is initiated in response to an application from
the chief executive officer and that
09 programs are regularly reviewed at reasonable intervals.
10 However, the dates of the next scheduled review of accredited
programs are not published. It should be noted that
11 the agency has several accreditation statuses that are not
equivalent to those used by the Office of Education.

12 It appears that self-study procedures are deficient in that
they do not provide for analytic assessment of program
strengths and weaknesses
13 or for an assessment of the accomplishment of programmatic
goals.
14 With respect to site visit procedures, agency policies for
the selection of visiting team members are unclear, but
15 the Association has provided vitae indicating the qualifications of the current visiting team members.

16 The agency's policy/decision-making body does not currently
have public representatives. Representation on that body

17 is also restricted to one area of the country, and some programs have complained that the agency does not allow for program input,
18 or is not otherwise serving their needs.
19 For instance, there are no formal procedures for programs to comment on revisions of standards prior to their adoption.

20 The information the Association provided about its method of assessing the reliability and validity of its standards is inconclusive;
21 there is no formal program to evaluate such reliability and validity.

22 The agency reports the specific reasons for adverse decisions to the chief program executive and offers an opportunity to appeal.
23 Procedures for appeals, however, are unclear.

24 Reactions of programs and the public indicate that evidence of the agency's acceptance is questionable, and
25 some doubt exists as to whether the agency ensures impartial and objective evaluations and decisions.
26 Moreover, the agency's standards of ethical practices are not clear in such areas as nondiscrimination in employment, tuition refunds, and recruiting.

C. WHAT ADDITIONAL FACTUAL INFORMATION ABOUT THIS AGENCY WOULD YOU HAVE FOUND USEFUL IN MAKING YOUR DECISION?

Please indicate below.

A. AFTER READING THE DESCRIPTION OF THE HYPOTHETICAL AGENCY BELOW, INDICATE YOUR JUDGMENT OF THE NUMBER OF YEARS THE AGENCY SHOULD BE RECOGNIZED.

Circle one of the 5 alternatives to the right: 4 YRS. 3 YRS. 2 YRS. 1 YR. DENY RECOGNITION (0)

The Paramedical Society of America

B. EACH NUMBER IN THE COLUMN TO THE LEFT OF THE DESCRIPTION CORRESPONDS TO ONE CHARACTERISTIC OF THE HYPOTHETICAL AGENCY.

Circle no more than five of the numbers, to indicate those factors that most influenced your judgment in A above.

01 In cooperation with the American Association of Medical Science
02 has accredited associate and baccalaureate degree programs
03 for about five years, and is now applying for
04 renewal of recognition by the Office of Education.

05 The Society, whose primary function is the approving of programs,
06 is national in scope. Most of the programs it
07 approves are administered in regionally accredited institutions, and the Society
08 is recognized by many other accrediting agencies.

09 Financial assistance is provided by its umbrella organization,
10 but the agency defines its own fiscal needs and manages its own budget.

11 In addition to full approval status, the agency grants a provisional status;
12 it does not have a preaccreditation status as defined by the Office of Education.
13 Provisional status involves completion of a self-study and an evaluation by a visiting team.

14 The required qualifications and procedures for selecting the Society's governing board members are prescribed in its petition.
15 Members of its policy/decision-making body are part of the agency's consulting pool.
16 In addition, the agency maintains a list of outside consultants.
17 It invites the participation of public representatives on all advisory councils.
18 Solicitation of the views of students is also part of the approval process.

19 Approval is withdrawn only after due process, for cause, and with due notice. The agency
20 reports the specific reasons for adverse decisions to the chief executive officer of the program and offers an opportunity to appeal.

21 The Society publishes a statement of ethics and requires programs to make their ethical practices known.

22 Program practices with respect to nondiscrimination in admissions and employment are monitored by the agency.

23 Approved programs are reevaluated at intervals shorter than the normal cycle under special circumstances.

24 Information about the Society's standards' development process is provided in its petition, along with a

25 description of the methods it employs in evaluating the validity and reliability of those standards.

26 Standards have been revised.

27 The Society also recently required programs to gather and submit information on program graduates.

C. WHAT ADDITIONAL FACTUAL INFORMATION ABOUT THIS AGENCY WOULD YOU HAVE FOUND USEFUL IN MAKING YOUR DECISION?

Please indicate below.

A. AFTER READING THE DESCRIPTION OF THE HYPOTHETICAL AGENCY BELOW, INDICATE YOUR JUDGMENT OF THE NUMBER OF YEARS THE AGENCY SHOULD BE RECOGNIZED.

Circle one of the 5 alternatives to the right: 4 YRS. 3 YRS. 2 YRS. 1 YR. DENY RECOGNITION (0)

Regional Schools Accrediting Agency

B. EACH NUMBER IN THE COLUMN TO THE LEFT OF THE DESCRIPTION CORRESPONDS TO ONE CHARACTERISTIC OF THE HYPOTHETICAL AGENCY.

Circle no more than five of the numbers, to indicate those factors that most influenced your judgment in A above.

01 accredits non-profit postsecondary institutions of all kinds within its region.
02 RSAA, which has been active for about 20 years,
03 is applying for renewal of recognition.
04 RSAA is a non-profit organization;
05 whose sole function is accreditation.

06 This agency appears to have adequate staff to carry out its activities, and
07 the responsibilities of its staff members are fully described in the petition.

08 Members of appropriate professional fields have a role in the accreditation process;
09 A broad spectrum of educators is included on the agency's policy/decision-making body.
10 A clear statement of the selection procedures for the site-team members is provided,
11 with faculty members and agency staff making up the site-visit teams.
12 In addition, the agency maintains a list of outside consultants.

13 RSAA has clearly established procedures which ensure impartial evaluations and judgments.
14 For example, members of the policy/decision-making body do not participate in discussions or decisions affecting institutions with which they are affiliated.
15 Also, the agency gives institutions the opportunity to identify errors of fact or interpretation in the visiting teams' report and to submit supplemental materials.
16 If an accredited institution should refuse to allow reevaluation, agency policy stipulates that accreditation be withdrawn.
17 With regard to complaints leveled at institutions, the agency considers "only substantially supported allegations which could impair institutional quality or effectiveness."

18 Procedures for determining preaccreditation status are clearly described,

19 and the procedures for obtaining preaccreditation are appropriately related to those for full accreditation.

20 The agency's standards, which have recently been revised,

21 are regularly reviewed by inviting suggestions from various interested groups.

22 One of the agency's requirements is that institutions gather information on their graduates.

C. WHAT ADDITIONAL FACTUAL INFORMATION ABOUT THIS AGENCY WOULD YOU HAVE FOUND USEFUL IN MAKING YOUR DECISION?

Please indicate below.

A. AFTER READING THE DESCRIPTION OF THE HYPOTHETICAL AGENCY BELOW, INDICATE YOUR JUDGMENT OF THE NUMBER OF YEARS THE AGENCY SHOULD BE RECOGNIZED.

Circle one of the 5 alternatives to the right: 4 YRS. 3 YRS. 2 YRS. 1 YR. DENY RECOGNITION (0)

Schools of Computer Science Advisory Council

B. EACH NUMBER IN THE COLUMN TO THE LEFT OF THE DESCRIPTION CORRESPONDS TO ONE CHARACTERISTIC OF THE HYPOTHETICAL AGENCY.

Circle no more than five of the numbers, to indicate those factors that most influenced your judgment in A above.

01 accredits institutions offering degrees at all levels in computer science.
02 SCSAC has operated as an accrediting agency for more than 20 years, and
03 is now applying for renewal of recognition.
04 It is a non-profit organization, whose
05 primary function is to accredit
06 proprietary institutions.

07 The agency's criteria for the selection of visiting team members are clearly stated,
08 specifying that the teams are made up of faculty members and agency staff.
09 In addition, the agency maintains a list of outside consultants,
10 and also includes a broad spectrum of constituents on its policy/decision-making body.
11 The agency's staff responsibilities and qualifications are described.

12 SCSAC either encourages or requires institutions to gather information on their graduates.
13 Clearly described procedures for determining preaccreditation are provided, and
14 criteria for preaccreditation are appropriately related to those employed for full accreditation.

15 The agency's standards have been revised, and
16 an active program to improve accreditation standards or evaluative procedures is carried out.
17 Clearly established procedures ensure impartial evaluations and judgments,
18 as well as provide for fair and timely treatment by the agency of complaints against institutions.
19 The agency's petition states that it considers an accumulation of complaints rather than a single one.

20 At the evaluation of the visiting team report, at least one of the visiting team members is required to be present,

21 and in the event of an adverse decision the agency reports the specific reasons to the chief executive officer of the institution and offers an opportunity to appeal.

22 The agency withdraws an institution's accredited status for refusing to permit reevaluation.

23 Finally, the agency performs no function inconsistent with the exercise of independent judgment about the educational quality of an institution.

C. WHAT ADDITIONAL FACTUAL INFORMATION ABOUT THIS AGENCY WOULD YOU HAVE FOUND USEFUL IN MAKING YOUR DECISION?

Please indicate below.